	FEICE
This certificate, issued under the seal of the Copyrigh Office in accordance with the provisions of section 410(a of title 17, United States Code, attests that copyright registration has been made for the work identified below. The information in this certificate has been made a part of the Copyright Office records. PA EFFECTIVE DATE OF REGISTRATION AUG 19 1991 Month Day OFFICIAL SEAL	A PAU
DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET. TITLE OF THIS WORK ▼ PREVIOUS OR ALTERNATIVE TITLES ▼	
NATURE OF THIS WORK & See Instructions Circle Compactor of television - Syndy's	signature Ed Episis
NAME OF AUTHOR ▼ Was this contribution to the work a "work made for hire"? Was this contribution to the work a "work made for hire"? Pes NAME OF AUTHOR'S NATIONALITY OR DOMICILE WAS THIS AUTHOR'S CONTRIBUTE THE WORK Anonymous? Pes Yes Yes Yes Yes	.1 ▼
NOTE No Domiciled in Domiciled	
Was this contribution to the work a "work made for hire"? No Pseudonymous? Yes No NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed.	RIBUTION TO
NAME OF AUTHOR V NAME OF AUTH	
Was this contribution to the work a "work made for hire"? Yes	RIBUTION TO where his is
NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼ YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED This information must be given in all cases. ONLY If this work has been published.	R WORK
COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. APPLICATION RECEIVED APPLICATION RECEIVED APPLICATION RECEIVED	
See instructions before completing this space TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.	

Case 6:23-cv-06025	-FPG-MWP Document	15-1-ckebigd 04/04/23 Page 2 of 96	A
	Case #6:23-cv-06025-FPG-MWP	CORRESPONDENCE	FOR
PAu 1 544		L Yes	COPYRIGHT OFFICE
–		DEPOSIT ACCOUNT FUNDS USED	USE
DO NOT WRITE ABOVE THIS LINE. II	F YOU NEED MORE SPACE, USE A	SEPARATE CONTINUATION SHEET.	
PREVIOUS REGISTRATION Has registration for this Yes No If your answer is "Yes," why is another reg This is the first published edition of a work previously registration submitted by this author as co This is a changed version of the work, as shown by space If your answer is "Yes," give: Previous Registration Number	work, or for an earlier version of this wo istration being sought? (Check appropria gistered in unpublished form. epyright claimant. 6 on this application. Year of Registration	tte box) ▼	
DERIVATIVE WORK OR COMPILATION Complet a. Preexisting Material Identify any preexisting work or a	e both space ha & hh for a derivative were	de complete anti- (h.f.,	6
			See instructions before completing
b. Material Added to This Work Give a brief, general stat	ement of the material that has been adde	d to this work and in which copyright is claimed.▼	this space.
DEPOSIT ACCOUNT If the registration fee is to be challed Name ▼	rged to a Deposit Account established in Account Number ▼	the Copyright Office, give name and number of Account.	7-
CORRESPONDENCE Give name and address to which P.O. BOX 400225 BROOKLYN, N.Y. 1124	0 6	Name/Address/Apt/City/State/Zip ▼ 4610 46370	Be sure to give your dayline phone
CERTIFICATION* I, the undersigned, hereby certify the	at I am the		
Check only one ▼ author			
□ other copyright claimant	. 1		
□ owner of exclusive right(s) □ authorized agent of. Name of author or other copyright claumant, or own	Der of exclusive properties 7		
of the work identified in this application and that the stateme	nts made		
by me in this application are correct to the best of my knowled	dge.	nan the date of publication given in space 3.	
by me in this application are correct to the best of my knowled	dge.	nan the date of publication given in space 3.	
by me in this application are correct to the best of my knowler Typed or printed name and date ▼ If this is a published work Handwritten signature (X) ▼	dge.		
by me in this application are correct to the best of my knowled. Typed or printed name and date ▼ If this is a published work Handwritten signature (X) ▼ MAIL CERTIFI- CATE TO	dge.	Have you: Completed all necessary spaces? Signed your application in space.	
by me in this application are correct to the best of my knowled. Typed or printed name and date ▼ If this is a published work Handwritten signature (X) ▼ MAIL CERTIFIA	dge. I, this date must be the same as or later the	date Mave you: Completed all necessary spaces?	

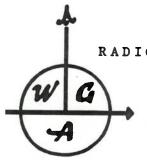
AIL CERTIFICATE OF COPYRIGHT BEGINTBADIONnent 15-1 Filed 04/04/23 This certificate, issued under the seal of the Copyright Office in accordance with the provisions of section 410(a) REGISTRATION 2885. of title 17, United States Code, attests that copyright registration has been made for the work identified below. The Case #6:23-cv-06025-FPG-MWP information in this certificate has been made a part of the 1 594 108 Copyright Office records. CIBRARY OF CONG EFFECTIVE DATE OF REGISTRATI REGISTER OF COPYRIGHTS OFFICIAL SEAL United States of America DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET. TITLE OF THIS WORK V NATURE OF THIS WORK ▼ See instructions Teleplay (pilot for television) / an epilot NAME OF AUTHOR ▼ DATES OF BIRTH AND DEATH 20 Was this contribution to the work a AUTHOR'S NATIONALITY OR DOMICILE WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK "work made for hire"? If the answer to either ☐ Yes ☐ Yes No (Citizen of) Anonymous? of these questions is No NATURE OF AUTHORSHIP Domiciled in > Yes," see detailed Pseudonymous? Briefly describe nature of the material created by this author in which copyright is claimed. NAME OF AUTHOR V DATES OF BIRTH AND DEATH Year Born Y Year Died 62 AUTHOR'S NATIONALITY OR DOMICILE Was this contribution to the work a WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK 'work made for him'"? If the answer to either Yes Citizen of ☐ Yes 🕱 No Anonymous? of these questions is No No Domiciled in Pseudonymous? ☐ Yes No instructions NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. NAME OF AUTHOR ▼ DATES OF BIRTH AND DEATH
Year Born ▼ Year Died Year Died V Was this contribution to the work a **AUTHOR'S NATIONALITY OR DOMICILE** WAS THIS AUTHOR'S CONTRIBUTION TO work made for hire"? ☐ Yes Citizen of ▶ Anonymous? ☐ Yes ☐ No of these questions is Yes," see detailed □ No Domiciled in ▶ Pseudonymous? ☐ Yes ☐ No NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼ YEAR IN WHICH CREATION OF THIS DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK WORK WAS COMPLETED This Information Complete this information Month Month must be given has been published ****************** COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the APPLICATION RECEIVED DEC. 19,1991 same as the author given in space 2. DEC. 19.1391

DEC. 19.1991

WO DEPOSITS RECEIVED See instructions before completing this space. TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named REMITTANCE NUMBER AND DATE in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

Case 6:23-cv-06025-FPG-MWP CDocument 15-MNEP-lie	d 04/04/23 Page 4 of 96 FC	ORM PA
Case #6:23-cv-06025-FPG-MWP		(Y
PAu 1 594 108		FOR
DEPOSIT AC	CCOUNT	PYRIGHT FFICE USE
DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CO		ONLY
PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been registration being sought? (Check appropriate box) ▼		
This is the first published edition of a work previously registered in unpublished form.		
This is the first application submitted by this author as copyright claimant. This is a changed version of the work, as shown by space 6 on this application.		***************************************
If your answer is "Yes," give: Previous Registration Number ▼ PAU 15+4 +1+ Year of Registration ▼		
DERIVATIVE WORK OR COMPILATION Complete both space 6a & 6b for a derivative work; complete only 6 a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.	6b for a compilation.	
CIPLERIES SI-Treatment	- (10) .	
CIRCIFICACION (120 MEAL)	See	e instructions
b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and	lhis	ore completi space
"SASHL SAIS" WAS A SYNOPSIS	as part.	
of a treatment to Gelfriends - This	version 15 a Scr	Ct.
DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Of Name ▼ Account Number ▼	fice, give name and number of Account.	
· · · · · · · · · · · · · · · · · · ·		1
•		
	lame/AddressiApt/City/State/Zip ▼	
	lame/Address/Apt/City/State/Zip ▼	
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. N	Be s	sure to
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. N	Be s	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. New Color Review NY 11240 Area Code & Telephone Number > 212/967-7711 CERTIFICATION* I, the undersigned, hereby certify that I am the	Be s give	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. New Color Sox 400205 FRUKLIN MY 11240 Area Code & Telephone Number > 212/967-7711 CERTIFICATION* 1, the undersigned, hereby certify that I am the	Be s give	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. No least the least to	Be s give	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. New Color Sox 40000 TIS 100 TIS 10	Be s give	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. No light and lig	Be s give	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. No. 100 April 100 Area Code & Telephone Number CERTIFICATION* I, the undersigned, hereby certify that I am the Check only one Check only one Action April 100 Check only one Action April 100 Action April 100 CHARLESTON April 100 Area Code & Telephone Number Action April 100 Action April 100 Action Action April 100 Action Action April 100 Action Acti	Be s give	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. N PICA PERMICE Area Code & Telephone Number Area Code & Telephone Number CERTIFICATION* I, the undersigned, hereby certify that I am the Check only one Other copyright claimant Check only one authorized agent of Name of author or other copyright claimant, or owner of exclusive right(s) authorized agent of Name of author or other copyright claimant, or owner of exclusive right(s) of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.	Bes gwe day CXT. 4637 ■ num	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. N PICA PERMICE Area Code & Telephone Number Area Code & Telephone Number CERTIFICATION* I, the undersigned, hereby certify that I am the Check only one other copyright claimant Moner of exclusive right(s) authorized agent of Name of author or other copyright claimant, or owner of exclusive right(s) of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.	Bes gwe day CXT. 4637 ■ num	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. No services the sent of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.	Be s give diversity of the state of the sta	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. New York Sox 40025 FLOWING MY 11740 Area Code & Telephone Number 12/2/30-7-7711 CERTIFICATION* I, the undersigned, hereby certify that I am the Check only one without or other copyright claimant Check only one authorized agent of Name of author or other copyright claimant, or owner of exclusive right(s) authorized agent of Name of author or other copyright claimant, or owner of exclusive right(s) for the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. Year of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. Handwritten signature (X) Handwritten signature (X) Handwritten signature (X)	Be s give diversity of the state of the sta	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. New York Sox 40000 Area Code & Telephone Number 118/0300 + 16000 Area Code & Telephone Number 118/0300 + 1	Be gwe gwe gwe and gwe num EXT. 4637	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. No like the sent of the copyright claimant. The copyright claimant copyright claimant of the copyright claimant. The copyright claimant copyright claimant copyright claimant. The copyright claimant copyright claimant copyright claimant copyright claimant. The copyright claimant copyright claimant copyright claimant copyright claimant copyright claimant. The copyright claimant copyrig	Be gwe day dependent of the space 3. date ► 8/3/91 Have you: • Completed all necessary spaces? • Signed your application in space 8? • Enclosed check or money order	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Note that the state of process of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. The process of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. The process of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. The process of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. The process of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. The process of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. The process of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. The process of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. The process of the pr	Be s give diversity of the state of the sta	your time phone
CORRESPONDENCE Give name and address to which correspondence about this application should be sent. No part of the control of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. It is a published work, this date must be the same as or later than the date of published work, this date must be the same as or later than the date of published work, this date must be the same as or later than the date of published work, this date must be the same as or later than the date of published work, this date must be the same as or later than the date of published work. Name Handwritten signature (X) Name Name	Be s give days CXT. 4637 Inum Anum Anum Have you: Completed all necessary spaces? Signed your application in space 8? Enclosed check or money order for \$10 payable to Register of Copyrights?	your time phone

Case #6:23-cv-06025-FPG-MWP



RADIO TELEVISION SCREEN

Writers Guild of America, East, Inc.

Affiliated with Writers Guild of America, West, Inc. 555 West 57th Street, New York, N.Y. 10019 / (212) 245-6180 FAX: (212) 582-1909

BY: LEE, LETICIA (AND OTHERS)

ADDRESS: PO BOX 400225

BROOKLYN, NY 11240

Soc. Sec. No.:

Charges for services in registering above titled manuscript in accordance with the provisions printed hereon.

TITLE:	GIRL	FRIENDS	
RE	G. NO.	063341	-00
DA	TE	05 - 20	_19 _91
RE	C'D. \$	20.00	

REG. BY: A Slynn

Please note: Registration is intended only for evidentiary purposes, to prove that a manuscript existed in a certain form on a particular date, which may be relevant in the event of legal action.

Registration is <u>not</u> the same as copyright and is not intended to be, nor is it intended to establish copyright. The Guild does not advise registrants on copyright matters.

Duration: You hereby authorize the Guild to destroy the manuscript without notice to you on the expiration of ten years from the date hereof. You may, however, renew the registration for an additional ten years, if, before the expiration date of the first ten year period, you pay the then applicable renewal fee and get a written receipt therefor. The fee should accompany request for renewal.

Withdrawal: At least 48 hours notice of intended withdrawal must be given to the Guild. A fee will be charged for withdrawal of the manuscript.

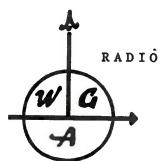
Authority to Request Withdrawal: The manuscript will be given up only on your signature, supported by identification. Be sure the name under which you register is your legal name. The Guild is not bound to surrender a manuscript registered under a pseudonym without proof of identity.

If the registration is in the names of more than one person, the written consent of all is required to authorize withdrawal. In case a registrant is deceased, proof of death and the consent of his/her representative or heirs must be presented.

Safekeeping: Registration is a service. Its purpose is to assist writers in establishing the completion date and the identity of literary property. The Guild will exercise reasonable care to protect the manuscript and the record of registration, but it undertakes no responsibility for loss or destruction of the manuscript or of the registration records arising from causes beyond its control. IN THE EVENT OF LIABILITY BY THE GUILD FOR FAILURE TO EXERCISE REASONABLE CARE, IT IS AGREED THAT THE LIQUIDATED DAMAGES FOR LOSS OF THE MANUSCRIPT SHALL BE \$25.00.

Registration is not a place to store your <u>only</u> copy of a document. If we lose it, depite our best efforts, our responsibility is limited to \$25 as detailed elsewhere herein. Keep another copy in a safe place within your control.

Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23 Page 6 of 96



RADIO TELEVISION SCREEN

toxh. DIRg

Case #6:23-cv-06025-FPG-MWP

Writers Guild of America, East, Inc.

Affiliated with Writers Guild of America, West, Inc. 555 West 57th Street, New York, N.Y. 10019 / (212) 245-6180 FAX: (212) 582-1909

BY: LEE, LETICIA (AND OTHERS)

ADDRESS: PO BOX 400225

BROOKLYN, NY 11240

Soc. Sec. No.: 🕊

Charges for services in registering above titled manuscript in accordance with the provisions printed hereon.

REG. BY

Please note: Registration is intended only for evidentiary purposes, to prove that a manuscript existed in a certain form on a particular date, which may be relevant in the event of legal action.

Registration is <u>not</u> the same as copyright and is not intended to be, nor is it intended to establish copyright. The Guild does not advise registrants on copyright matters.

Duration: You hereby authorize the Guild to destroy the manuscript without notice to you on the expiration of ten years from the date hereof. You may, however, renew the registration for an additional ten years, if, before the expiration date of the first ten year period, you pay the then applicable renewal fee and get a written receipt therefor. The fee should accompany request for renewal,

Withdrawal: At least 48 hours notice of intended withdrawal must be given to the Guild. A fee will be charged for withdrawal of the manuscript.

Authority to Request Withdrawal: The manuscript will be given up only on your signature, supported by identification. Be sure the name under which you register is your legal name. The Guild is not bound to surrender a manuscript registered under a pseudonym without proof of identity.

If the registration is in the names of more than one person, the written consent of all is required to authorize withdrawal. In case a registrant is deceased, proof of death and the consent of his/her representative or heirs must be presented.

Safekeeping: Registration is a service. Its purpose is to assist writers in establishing the completion date and the identity of literary property. The Guild will exercise reasonable care to protect the manuscript and the record of registration, but it undertakes no responsibility for loss or destruction of the manuscript or of the registration records arising from causes beyond its control. IN THE EVENT OF LIABILITY BY THE GUILD FOR FAILURE TO EXERCISE REASONABLE CARE, IT IS AGREED THAT THE LIQUIDATED DAMAGES FOR LOSS OF THE MANUSCRIPT SHALL BE \$25.00.

Registration is not a place to store your <u>only</u> copy of a document. If we lose it, depite our best efforts, our responsibility is limited to \$25 as detailed elsewhere herein. Keep another copy in a safe place within your control.

Characters 1st Season outline

Case #6:23-cv-06025-FPG-MWP

GIRLFRIENDS

(30 minute sitcom for television)

Created By: LeTicia Lee
Tracey Moore

Copyright 1991
Registered at Writer's Guild East

"GIRLFRIENDS" - :30 sitcom

The main characters are spunky, fresh, young Afro - American women of the nineties. The three met in college (N.Y.U.) where they studied film and theatre. They have reunited a few years later under one roof in a brownstone in Brooklyn.

CHARACTER BREAKDOWN

TERRI - Terri is twenty eight year old ever aspiring actress/singer. She works full time as a receptionist at THE TALENT AGENCY. Terri fears being poor and unknown. She has an offbeat sense of humor. She is constantly borrowing money, for she lives from paycheck to paycheck. She is very sentimental and is always falling in love with a different man. Her character is extremely animated. Her clothes are very colorful, almost playful. She exaggerates about everything, if for no other reason besides keeping life interesting. Terri can amazingly talk herself out of the most complicated situations. And she often comments by using lines from various songs.

MONIQUE - Monique is a thirty year old independent film producer. She is very practical, loves her work, and feels very maternal towards her problematic housemates. She often lectures the girls, but often finds herself seeking advice from them as well. Monique loves peace and quiet and believes in structure nd calmness. She is health conscious, and is a former dancer and model.

ERIKA - Erika is a twenty nine year old writer. She is spiritual, and therefore follows her intuition and not logic, no matter how logical it is. She lives in the shadow of her childhood conscious; and feels that she must please her family. She welcomes all kinds of strangers in need into the household. She habitually falls asleep in public.

ADDITIONAL PLAYERS

BOBBI - Bobbi is the gay next door neighbor. He is an excellent listener and is extremely supportive. When he's not helping them with a relationship, he maintains a freezer full of ice cream. Each flavor symbolizes a different problem. Heavenly Hash for celebrating, Butter Pecan for anger or frustration to Rum Raisen for a broken relationship, all are just a sample of Bobbi's in house ice cream shop. This addiction to ice cream keeps Bobbi battling an imaginary bulge by taking his Afrobics class three times a week with the girls.

ROBERT - Robert is the neighbrhood mailman. He is very flirtatious with the girls and is homophobic. (Clearly not a friend of Bobbi's)

SASHA - Erika's tarot card reader and confidant.

Episode: "Sold On Spec"

The girls have just returned home from a writing contest ceremony of which Erika is one of the honorees. Monique and Terri criticize Erika for falling asleep during the ceremony. Erika seems unconcerned. The girls think Erika's sleeping condition is getting serious; it happens at the most inopportune moments. Erika is convinced that she is meditating, and it will help her to be a better writer.

The next day, Erika receives a call from a producer of THE COSBY SHOW who was in attendance at the ceremony the night before. Erika goes to Astoria Studios to meet with the producer in person. Erika just happens to have written a script on spec for THE COSBY SHOW that she had never submitted. Monique talks Erika into bringing the script with her to the meeting.

The producer loves the script. Erika is hired to polish the script. The girls invite Bobbi over to celebrate Erika's good fortune. He brings heavenly hash ice cream.

Later that week, Erika returns home in a less than blissful mood. She enters and goes directly to her bedroom. Terri knocks on Erika's door to find out what's wrong. Erika runs down the events of the production meeting. She describes a lavish conference room and drops names of the mega producers in attendance. She goes on and on but Terri can not see what the problem could be. Terri is patient.

TERRI

But what happened Erika?

Finally, Erika reveals that the room was too warm and the meeting was much longer than she expected.

ERIKA

When I opened my eyes, I realized that all eyes were on me. Bill Cosby himself had asked me some stupid question about his character while I was in deep meditation.

TERRI

Erika, what are you telling me? (beat) Did you sleep through the production meeting for THE COSBY SHOW, your major break into television?

ERIKA Ah...yes.

Episode: "Interception"

Monique is at her boyfriend's, Tony who is a director, office working on his computer. He is on location shooting an AMERICAN EXPRESS CARD commercial, but he is expecting an important telephone call. Monique agrees to answer the telephone while he is away.

She repeatedly receives calls from a young man who is eager for Tony to read his script. Monique tells the caller patiently that Tony will return his call. The caller is persistent. He explains that he has tried unsuccessfully to reach Tony on several occassions. Apparently, Tony was a guest speaker at his university and made quite an impression. The young man felt sure that Tony could relate to his characters.

Monique recalls her days as a production assistant and sympathizes with the caller. She asks him to pitch the storyline to her in a sentence. He does. Monique is impressed.

Monique invites the writer to the office. They have a great conversation. He leaves the script on his way out. Monique leaps right into script and completes it before Tony returns to the office. Monique is in awe. She believes that this is the screenplay tht could set her career back on the right path.

She is contemplating whether or not to discuss her day with Tony when he returns. She doesn't. Afterall, if Tony was interested, he would have called by now.

For days, Monique is turned with guilt for intercepting the script from Tony. Supposing the writer calls to find out if Tony liked the script before Monique is able to get back to him. Thus, Monique is very touchy with her housemates. This continues for awhile until finally Terri and Erika have had it.

Monique explodes her confession to the girls. She reveals the secret that won't let her conscious rest. Monique confesses to Terri and Erika how she intercepted the script that she believes can be a masterpiece.

Erika plays devil's advocate. As a writer herself, she says that Tony had his chance and should have returned the call. Because he did not, he automatically forfeit the opportunity. In Erika's opinion Monique has done nothing wrong.

Terri slips on her wings aand stands on Monique's other shoulder. Terri asks Monique what is more important to her, her career or her relationship. Monique who is "married" to her work is really confused now.

In the end, Monique opts to tell her boyfriend about the script. Tony is still not interested; Monique goes on to produce it herself.

Episode: "In The Red"

Terri is notorious for not being able to keep money. Although she maintains her position at The Talent Ageny as a receptionist full time, it is not enough to cover her escalating bills. In particular is a new acting class which is three hundred dollars per session. Terri's weekly salary is not much more than that.

Terri is the epitomy of a starving artist. She begins to bum a couple dollars off of Erika and a token there from Monique. And she maintains a hearty appetite from running to auditions in record time between coffee breaks. The girls can not keep food in the refrigerator with Terri around.

Monique is through with Terri. She devises a budget to help Terri swim in the mainstream of life so that she can afford the bare minimum of its costly necessities. Monique also suggests that Terri either find one higher paying full time job or take on another part time job for two or three days a week. Terri is not excited about her options.

Terri refuses to give up her position at The Talent Agency. Not only is management flexible with her hours, but she also has access to the character breakdowns for upcoming features and commercials. And of course she "acts" as Fifi, her own agent. So leaving the agency was not even an option.

Terri therefore decides to take a job as a waitress at JAZZ FRONT a popular nightclub in the village, which is well frequented by celebrities. Everything is running smooth and the girls are once again a harmonious household.

Two weeks have passed with no difficulties until one morning, when Terri whispers in Erika's ear for ten dollars. Erika is surprised and disappointed.

ERIKA

What happened?

TERRI

Well, since I've been at JAZZ FRONT, I have truly realized my desire to sing. And it only adds to my marketability as an actress. So, I started taking singing lessons from Madam Yurri last Wednesday....So umm you got ten? I'll settle for five.

Episode: "Personal Ads"

Erika is having a dry season in the dating circuit. She is very bored and frustrated to say the least. Out of desperation, she answers a personal ad in CHOCOLATE SINGLES.

The two meet on neutral grounds. They meet at the information booth at Grand Central Station. It is the halfway mark between Harlem (his home) and Brooklyn (Erika's home).

Erika finds her date to be humorous, considerate, and oh yes even slightly attractive. But the bait that really got him reeled in? He is also a writer. It's almost too good to be true.

Erika and Chuck are dating frequently. She becomes so preoccupied with him that she is beginning to miss her deadlines. Meanwhile, her new love is selling his work before the ink can dry.

Terri becomes concerned about Erika's new priorities. She is also suspicious of Chuck's sudden burst of fortune. Before dating Erika, he hadn't sold anything in 9 months. Could Erika be pitching concepts in her sleep again?

Terri has nothing solid on which to base her suspicions until one day she finds Chuck going through Erika's "material in the works" file while she is making dinner. It seems that "Mr. Wonderful" is stealing Erika's concepts.

When Terri confronts Erika, she immediately defends Chuck and accuses Terri of being jealous. "You're going through a very low period right now Terri", nods Erika as she rubs the crystal hanging from her neck knowingly, "and misery loves company". Terri storms out of the house and finds herself at Bobbi's front door. Bobbi offers Terri butter pecan ice cream.

Terri returns home to find Monique alone in the living room. She tells Monique about Chuck. Monique does not want to get involved.

Erika enters with an attitude.

ERIKA

Monique, could you ask Terri when she intends to return that \$10.00 I loaned her three weeks ago?

TERRI

Monique, will you tell Erika that I would rather slide down a razor blade into a pool of alcohol before I pay her back.

Monique can't take it anymore.

MONIQUE Stop!!!

Monique asks Erika if she has read the works that Chuck has sold. She has not. Terri pulls three magazines out of her knapsack. She has stopped at the newstand with Bobbi before returning home. Erika is faced with the truth. Poor Erika.

Episode: "SASHA SAYS"

Erika is experiencing writer's block. She is extremely frustrated and has not been able to write anything fit for even the ENQUIRER. She tries everything. Erika stands on her head, massages her temples, and consumes plenty of "brain food".....fish. When she is full to the gills, she visits Sasha, a spiritual guide.

Erika tells Sasha about all her problems and tells her what she must do to overcome this block. Erika is relieved. She follows Sasha's advice, but nearly drives Terri and Monique insane with her crazy antics. She rationalizes everything with "Sasha says I should....".

The other two girls are so at a loss as to what to do with Erika that they decide to go to the culprit, Sasha. Sasha tells Monique about a feature that will come along to break up the tiresome string of music videos. And she shares a vision of Terri receiving a part on her favorite soap opera "The Dark and the Lovely". Both girls chill out immediately with Erika. Suddenly, all three are wearing crystals around their necks.

Monique is offered an independent feature, but it's a low budget soft porn movie. She passes. And as forecasted, Terri is offered a role on her favorite soap opera as the nervous nurse in the hospital cafeteria. But in the final cut, it is an off screen voice.

Erika on the other hand begins to write her butt off and gets two of her stories printed in COSMO and ESSENCE magazines in the same month.

Erika comes to breakfast the next morning speaking of her good fortune. She reaches into the freezer only to find her crystal in the ice cube tray. Terri responds casually to Erika's puzzled face by saying that Erika was getting too hot and needed to chill out.

"GIRLFRIENDS"

Episode: The Seminar

"After weeks of constant work, the girls decide to treat themselves to a night on the town. While they are dolling themselves up, Monique voices her concern over the lack of good men. Erika and Terri disagree and Terri explains a surefire way of attracting the right men. "Look deeply into his eyes, says Terri," and watch him fall apart! "The girls laugh but agree to test their new found knowledge.

When at the party, the girls distant themselves in three separate areas and work their magic. Once the party has ended we find the girls have tossed out the bait and are reeling them in. They're environmentalists though, instead of taking the fish home, they toss them back in. They only play for the sport.

Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23 Page 15 of 96

Case #6:23-cv-06025-FPG-MWP

GIRLFRIENDS

EPISODE: SASHA SAYS

AN ORIGINAL TELEPLAY

BY

LETICIA LEE & TRACEY MOORE

FIRST DRAFT

COPYRIGHT LETICIA LEE & TRACEY MOORE 1991
REGISTERED AT WRITERS GUILD EAST

FADE IN

INT. GIRLFRIENDS' KITCHEN - DAY

TERRI jogs into the kitchen wearing a warm up suit. She is apparently just in from the outdoors. She's short of breath. She sits down for a moment and puts her head between her legs and mumbles to herself.

TERRI

Whoa! (Breathe. Breathe.) Whoa! This can't possibly be good for you. I feel like I'm gonna die.

TERRI looks up and sees several bottles of pills on the kitchen table. GOLDEN SEAL ROOT, VITAMIN B-12, COD LIVER OIL, BRAIN PEP etc.

TERRI

Brain Pep? New York would be a better place if drug pushers gave these away instead. (She laughs to herself)

TERRI stands and goes into the refrigerator. She is apparently looking for something that she can't find.

TERRI

I told them not to touch my Gatorade. Those greedy......

ERIKA (O.S.)

There's a case in the cabinet under the sink.

TERRI slowly looks over her shoulder, but doesn't see anyone. She closes the refrigerator and looks around the room which is connected to the livingroom.

TERRI

Erika?

ERIKA

Yeah? (strained voice)

TERRI

Where are you?

ERIKA

I'm right here. Next to the Kool-Aid stain on the carpet.

TERRI tries to follow the voice. She's standing next to the tall corn plant in the livingroom when ERIKA continues.

ERIKA

Bring a cup of water with you. This poor plant is suffering.

TERRI looks on the other side of the corn plant and sees ERIKA standing on her head.

TERRI

Lord! I have seen it all now. Erika, what are you doing?

ERIKA

Fighting.

TERRI

So......If I push you over and pin you to the bottom of this corn plant, does that mean I win?

ERIKA

No. I'm fighting writer's block.

TERRI

Well alright Gandhi and your passive resistance.

TERRI walks back into the kitchen. MONIQUE enters. TERRI'S head is under the sink. She is getting a bottle of Gatorade.

MONIQUE

Hey Girl!

TERRI bumps her head. She looks up and sees MONIQUE.

TERRI

Girl! You scared me. I thought you were walking on your hands.

MONIQUE

What?

TERRI

Never mind. How was your shoot?

MONIQUE

Alright. You've seen one car commercial, you've seen 'em all. (She looks at the bottles on the table.) Did I hear you talking to someone just before I came in?

TERRI

Yeah. (slurp) I was talking to Erika. (slurp)

TERRI

Yeah Girl, me too. Don't wait up for me either.

TERRI and MONIQUE get up to exit.

TERRI

Come on Nikki. Treat me to dinner at Carolina Kitchen. I'll pay you back at the end of the week when I get paid.

MONIQUE

Okay. Okay. But what happened to your check fromNever mind.

TERRI (O.S.)

You know I was behind on payments for my acting classes, and then I had to buy those BAAAD aerobics sneakers. Girl, they let me bounce so high there ain't nothin' but a cool breeze ripplin' between my.....

EXT. BROOKLN BROWNSTONE - DUSK

We follow MONIQUE and TERRI out to the street, through the window. We hear the sound of car doors slamming shut on a tree lined Brooklyn street. A red Lamborghini speeds off. We come back in to find ERIKA in a sleep like state.

DISSOLVE TO

INT. KITCHEN - DAY

ERIKA is seated at the kitchen table with SASHA, an eccentric looking Greek woman.

SASHA

So my darling, Erika. That's it. You had a good reading. I've read you thoroughly. I am calm and well rested. Do you have any questions for me?

ERIKA

Uuuuh. No. I feel much better. I thought I was experiencing blockage. But you seemed to have answered all of my questions in the reading. I just want everyone to be happy. How can I thank you?

SASHA

Thank me? Oh no Erika my friend this is what I do. It pleases me to see someone as talented as yourself share her stories with the world.

ERIKA

Oh Sasha.

The two hug from across the table. ERIKA kisses SASHA gratefully on the cheek.

SASHA

Now I must go darling. Next time you must come visit me. It is rare when I can get a moment away from my clients. But when you have a gift...aaahhh... how it blossoms when you share it with the world. You're mother - MAY SHE REST IN PEACE -- told me that when we were just little girls in Queens. Now that was a gifted woman.

The doorbell rings. ERIKA walks across the room to answer the door. SASHA collects her cards and her garb. ERIKA re-enters with ROBERT, the mailman.

ROBERT

Well I'll be. It's a real live gypsy.

ERIKA hits ROBERT on the back of the head as she passes.

ERIKA

Robert, this is Sasha. She's a very good friend of mine and was even an better friend to my mother.

ROBERT

Well. Well. Pardon me. It's all starting to make sense now.

SASHA extends her hand as if she is royalty.

SASHA

Lovely to make your acquaintance Mr. Robert.

ROBERT

It's Robert. Just Robert.

She stares into his eyes.

SASHA

Well. I'm sorry that I can not stay and chat. I have several appointments before my day is over. Lovely to have made your acquaintance Mr...Excuse me. Robert.

ROBERT seems uncomfortable.

ROBERT

Yes. Same here.

ERIKA walks SASHA to the door.

ERIKA

Goodbye, Sasha.

SASHA places an amythest crystal around ERIKA'S neck; she then holds Terri's face carefully with one hand.

SASHA

(whispers)

And remember Darling, focus. Don't let everyone else's problems become yours.

ERIKA

Yes Sasha. I'll try.

SASHA exits.

ROBERT

Did someone leave a freezer open? (Erika ignores him and starts cleaning off the table from lunch) And what's with you hitting me on the back of the noggin?

ROBERT rubs his head as if he suddenly realizes that it hurt.

ERIKA

You were being rude, Robert.

ROBERT

But that's not like you. Terri or Monique maybe...No definitely. Especially Terri. That girl hits hard! Monique cuts me with the sharp edge of her tonque and gives me that eeeeevil eye. Man that girl got an evil eye. But not you Erika.

ERIKA

Well this is the new Erika. And if you have a problem with it, you can leave my house.

She continues loading the dishwasher. ROBERT is apparently surprised.

ROBERT

Well here's your mail Ms. Thang.

He throws the mail down and leaves. TERRI enters limping.

TERRI

What's wrong with Robert?

ERIKA

Beats me.

TERRI

Girl, what a day I had today. First Amy. Remember Amy the new secretary? Anyway that girl quit today. That obnoxious agent, Debbie, kept riding her. Get me coffee. Pick up my clothes from the dry cleaners. Do this. Do that. You would think Amy was her private secretary. And today of all days, contracts had to be typed. Girl they looked at me, and I said don't even feel it. I am the receptionist only. Besides, I just got a manicure. And ooh, Juan was teaching aerobics at the gym during my lunch hour. (She looks dreamy) So I politely called an agency and had them send over a temp A.S.A.P. And then, I proceeded to go to my aerobics class. Juan said, "Kick higher ladies! No man wants a woman with chunky thighs!" Girl, you know I was kickin' with all my might. And before I knew it both legs were kickin' in the air at the same time. My butt had confirmed gravity. I'm in paaaaaain!

By this time ERIKA has just completed cleaning the kitchen.

ERIKA

I'm sorry Terri; I don't have time for your worries today. Sasha says that I need to stop taking on the prolems of the world.

ERIKA exits and leaves TERRI shocked.

CUT TO

INT. TERRI'S BEDROOM THE NEXT DAY - NIGHT

TERRI sits in her bedroom with a bandaged ankle. She is painting large bold lines onto the canvas with fierce energy. We see other renditions of her colorful childlike masterpieces. We hear faint conversation from below. The tone peaks. We hear footsteps getting louder. The door is whirled open. MONIQUE enters still wearing her overcoat.

MONIQUE

What the hell is her problem?!?

TERRI

I don't know my African sister, but you almost killed Mr. Elephant.

MONIQUE closes the door, and sees a painting of a purple elephant behind the door with a once three dimensional trunk now twisted to the side.

MONIQUE

I'm sorry Girl.

TERRI

That's alright. I'm just glad you're home. I've been dealing with this Sasha says hokus pokus for the last twenty four hours.

MONIQUE sits in one of Terri's funky home made upholstered chairs.

MONIQUE

You too? That girl is about to drive me mad! Every other word out of her mouth is Sasha says. You know what?

TERRI

What?

MONIQUE

I'd like to know what Sasha said to that chile.

TERRI

Me too. I think we should make a visit to Ms. Sasha and find out how to reverse the spell.

MONIQUE

I don't know about all of that Terri. That woman makes me..... (Monique shivers)

ERIKA strolls in swiftly with a sheet of paper in hand. She hands it to TERRI.

ERIKA

Terri, this is a total of the monies you've owed me since the beginning of time. And mind you, rent is due in next week and you still owe me for this month's rent.

TERRI'S eyes boggle in shock as the scroll like document unrolls, and drops to the floor, just barely missing the tip of MONIQUE'S feet.

ERIKA

And Monique, I've been more than fair about you using that additional room down the hall as an office. Here's a notice for next month. It reflects a thirty percent markup in your rent. Sasha says that I can not be held responsible for the financial plight of others. (Inhales deeply - to herself) Aaah that wasn't so bad. (Aloud) Thank you ladies, and have a good evening. (She exits)

There is momentary silence in the room. TERRI tears up the financial data sheet, and looks to MONIQUE.

TERRI

'You driving?

MONIQUE

Is Michael Jackson bad?

TERRI

Let's beat it.
(TERRI & MONIQUE exit)

CUT TO

INT. BOBBI'S APT. - 5 DAYS LATER

TERRI is seated in BOBBI'S workspace. Bobbi is matching swatches (materials), prepping for a shoot. TERRI is adorned in a huge crystal which lyes heavily around her neck.

TERRI

So, my agent, Fifi, gets a call as soon as she steps into.....

BOBBI

Wait a minute. Aren't you Fifi?

TERRI

(Disgusted) Uh. Yeah.

BOBBI

Save that "my agent version" for your interview with VANITY FAIR.

TERRI

Anyway....pay attention! (she takes a deep breath) So then, I get a call from Juan.

BOBBI

Juan. You mean the ONLY afrobics intructor at THE SWEAT FACTORY!?!

Now BOBBI is intrigued.

TERRI

Yes, the one. Anyway, he called to tell me that one of his students asked about me. 'Cause you know I haven't been to class in a week because of my sprained ankle, and there ain't no way I'm

BOBBI

Excuse me.

TERRI

(irritated) What?

BOBBI

Is this going to be one of your long stories? Because if it is, I'll wait 'til it comes out on video.

TERRI

Bobbi, I'm setting it up for you. Be patient. (Clears her voice) So then, he tells me that the woman's name is NEQUITA TAYLOR!

BOBBI

Umm. Hmmm. (obviously no impression) Do I know this woman?

TERRI

Nequita Taylor is THE casting director of THE DARK AND THE LOVELY.

BOBBI

No!

TERRI

Yes!

BOBBI

You know that's my soap!

TERRI

Yours and mine both! Listen, it gets better. She wanted me to read for the part of Nurse Sassy.

BOBBI

No!

TERRI

Yes! She told Juan that I was the character, and Juan told ' her that I was in fact an actress! So I read for her today and got the part! Can you believe it?

BOBBI

Whaaaaat?

TERRI

(twirling her crystal)
Yes. And why did Sasha tell me that
I would get cast on a show that I
frequently watch and admire, which
I did and I do.

BOBBI

Umm. Hmm.. (doubtful tone)

TERRI

And she told Monique.....

TERRI

Then how do you explain all of these positive things happening all at once for Monique and I?

BOBBI

Well. In my opinion, once you start to focus on your goals, good things inevitably happen. The key is peristance. Perseverance.

TERRI'S eyes fill with tears. She looks as if she is really about to cry.

BOBBI

What's wrong with you?

TERRI

Sasha says that my life is filled with positive, self motivated people. (She jumps up and gives Bobbi a huge hug.) Oh Bobbi, did I ever tell you what a good friend you are to me?

BOBBI

(stunned) Oh Sweetie, of course. I am the best. As a little boy, when I used to return from summer camp, my mother would scream about the loads of mail I would get addressed "Dear Abbi" throughout the first half of the school year. Now let me go; you're crystal ball is piercing my Armani silk.

TERRI lets go of him.

BOBBI

Some of those silly children still write me too.

TERRI

Really?

BOBBI

Yes. Married with children too.

TERRI

What do you tell them?

BOBBI

The same thing I told them when I was twelve....Let nothing stand between friendship. Not miles, years or even Sasha.

TERRI

That's beautiful.

BOBBI

So next time, feel free to come to me. I'll put the fifty dollars towards the ice cream fund. Which reminds me. Sounds like we've got some celebrating to do.

TERRI

Heavenly hash?

BOBBI

Your face is grinning on the cover.

TERRI

You know I'm prepared. (she pulls her favorite spoon from out of her back pocket)

They head towards the kitchen.

CUT TO

INT. GIRLFRIEND'S LIVINGROOM - TWO WEEKS LATER

ERIKA is propped in front of her laptop computer counting sheep. She is surrounded by piles of balled up paper. The telephone rings. ERIKA is startled.

ERIKA

Hello?.....Hi Terri....What? Speak up. I can't hear you... I don't know Terri, I'm really busy here....Okay. Okay.... Terri, I said okay.

ERIKA hangs up the phone. The doorbell rings. ERIKA goes to the door. It's BOBBI.

ERIKA

Hi, Bobbi. (they walk inside) Did you bring the blank tape?

BOBBI

Yes. Yes. That crazy woman called me from the train station. She should be here any minute.

ERIKA

Well help yourself ...

ERIKA goes back to her laptop and begins pecking quickly at the keys. We see what she's writing from over her shoulder. It reads: MARY HAD A LITTLE LAMB THE FLEECE.....etc. BOBBI is busy setting the tape to record..

BOBBI

So how have you been doing Erika? I heard through the grapevine that the spirits have really been looking out for you all.

ERIKA

I'm fine. I am finally learning to disconnect myself from everyone's problems and focus on the energy within.

BOBBI

Disconnect yourself?

ERIKA

Yes. I don't have time to rescue Terri or act as a sounding board for Monique. Sasha says that in order for me to stay grounded, I must look out for number one.

BOBBI sits on the couch and points the remote towards the television.

BOBBI

My mother used to always say, when you point your finger at someone else, three fingers are pointing back at you.

ERIKA looks perplexed; she continues writing. Just then TERRI comes darting through the door.

TERRI Aaaah. Is it on? Is it on?

TERRI

Shhh. Come on. Come on. Sit down. Glad you could make it.

The three sit in front of the television as ERIKA continues to peck her ABC's on the computer. Forty-five minutes have passed. ERIKA is asleep at the computer. Monique is reading the HOLLYWOOD REPORTER. BOBBI is dabbing tears from his eyes. TERRI is leaning into the television.

TERRI

Aaaaaaah! Here I come!! Here I come!!!

MONIQUE & BOBBI

Where? Where?

TERRI

Right there!! Shhhh..

We see only the back of Nurse Sassy. A group of interns stand huddled blocking her and learing at the handsome Dr. Jacobs.

NURSE SASSY

Doctor Jacobs, here's the report from the lab on Baby Annie Mae.

DR. JACOBS

Thank you nurse. (he winks at the interns and exits)

The interns disperse. The credits roll over Nurse Sassy's back as she takes notes at the station. MONIQUE and BOBBI look at each other in premature anticipation of TERRI'S reaction.

BOBBI

(breaking the ice)
Nurse? Like he doesn't know
your name. How funky.

TERRI is silent.

MONIQUE

Is that the back of your head? Well, at least they bumped your hair.

BOBBI

Starched is the word I believe you're looking for.

TERRI

Did you see those little girls?

BOBBI

Cheap.

MONIQUE

You were great Terri.

TERRI

And Ms. Thang with the ponytail and thick hips was really quite blocking me. I didn't even realize he had winked at them too.

BOBBI

You know he's a womanizer.

TERRI falls silent and then starts to pout.

MONIQUE

Terri...(no answer)...Terri.

TERRI

What?

MONIQUE

I don't get it. Are you upset because you were upstaged or because Dr. Jacobs didn't ask for your phone number.

TERRI

Please. Ask for my number? You think I would take that chance. I tried to give him my phone number! If he had taken it, I wouldn't care about being upstaged. Hmph. Married.

MONIQUE

What?

TERRI

Look. I'm grateful to have had the opportunity to be on my favorite soap opera of all time. I had a ball!

BOBBI

I know you did.

Everyone falls silent in deep thought. ERIKA'S brow is really wrinkled. TERRI and BOBBI start cracking up.

TERRI

No!

MONIQUE

Yes! Tony asked me if he could direct!

BOBBI

I bet he did. Barefoot at that.

They all laugh. Just when the laughter dies down, ERIKA starts cracking up. They all look at her like she has really lost her mind and start laughing at her. ERIKA thinks they're laughing with her. She then starts pecking away swiftly at the keys on the laptop.

CUT TO

INT. GIRLFRIENDS KITCHEN - WEEKS LATER- DAY

TERRI and MONIQUE are seated at the kitchen table eating breakfast and reading various drafts written by ERIKA.

TERRI

Erika is jammin'. Did you read the article that COSMO accepted entitled "Sasha Says"?

MONIQUE

Yeah Girl. She is too funny.
I love this article about "Being in Tune with One's Self" that she wrote for ESSENCE. The girl is bad! You would never know how talented she is by the way she stands on her head.

TERRI

Right!

TERRI

(to Monique) She expresses herself better on paper doesn't she?

MONIQUE nods in agreement.

ERIKA

What's going on here?

MONIQUE looks up with genuine concern and sees ERIKA holding the ice tray by a single string much like the one from her amythyst crystal necklace. TERRI never looks up.

TERRI

Well....You were getting a bit too hot. So I thought I'd help you to chill out.

They all laugh. ERIKA brings the ice tray behind TERRI and pours the ice down her back.

FADE OUT CREDITS ROLL

13-1 Filed 04/04/23 Page 33 01 90 0 Se #6, 23-CV-06025-FAG-MWP

 Q_1

LeTicia Lee

dba SoRichlam Media

1335 Jefferson Rd #20711

Rochester, New York 14602 USA

Plaintiff

-VS-

Warner Media 30 Hudson Yards New York, NY 10001

Defendant

Case #6:23-cv-06025-FPG-MWP

(Case ID Number)

AFFIDAVIT

I, LeTicia Lee, dba SoRichIam Media of Rochester, New York of Monroe County, New York, MAKE OATH AND SAY THAT:

- Warner Bros. Producers used my sitcom treatment, "Girlfriends (c) 1991" to create the sitcom, "Living Single" 1993-1998
- 2. Summer 1991, while visiting Los Angeles, CA to pitch the GIRLFRIENDS sitcom to various producers and studios my then writing partner, Tracey Moore, and I had lunch with our former Brooklyn neighbor and "friend" Warren Hutcherson a then fledgling New York comedic writer who was working on another sitcom in development.

- 3. In 1991, Tracey and I practiced our GIRLFRIENDS sitcom pitch with our "friend" Warren Hutcherson and showed him our treatment for "feedback".
- 4. In 1991, Warren Hutcherson was very encouraging but had nothing to add to what we had developed except to say "good luck".
- 5. In 1991, Tracey Moore and I left a treatment for GIRLFRIENDS (C) 1991 a six person ensemble composed of three women and three men of color in their twenties in various situations trying to balance life and career who sharing life stories living in the same Brooklyn Brownstone with Warren Hutcherson in case he came across someone in Hollywood who could help us develop our project.
- 6. Tracey and I had met with Warren Hutcherson in 1991 who later became an Executive Producer at Warner Bros
- 7. In 1991, Tracey Moore and I also met with Karen Handel at HBO in regards to developing GIRLFRIENDS.
- 8. In 1993, a show called LIVING SINGLE aired on FOX about an ensemble of young urban women and two male friends in their twenties living under one roof in Brooklyn, New York.
- 9. Ironically, one of the lead actors in LIVING SINGLE, Erika Alexander, was a personal friend of Tracey Moore's at that time who had visited us often while we developed GIRLFRIENDS and knew we had pitched the project to producers in Los Angeles.
- 10. It wasn't until early 2021, while seeing GIRLFRIENDS and LIVING SINGLE in syndication during the COVID 19 lockdown, that I decided it was finally time to do some research.
- 11. It was then, early 2021, that I discovered that Warren Hutcherson was a Consultant and Producer for the 1993 LIVING SINGLE pilot.
- 12. LIVING SINGLE character Khadija comes from GIRLFRIENDS character, Monique.
- 13. LIVING SINGLE character Sinclar comes from GIRLFRIENDS character Erika
- 14. LIVING SINGLE character Maxine combines GILRFRIENDS characters Terri and Monique

LIVING SINGLE in syndication, reboots, in any and all formats (television, videos, streaming, film, merchandising etc) and in any current and/or future formats yet to be created here forth.

26. You have thirty (30) days from the postal date received to respond to each of the above mentioned claims. Thank you.

STATE OF NEW YORK

COUNTY OF MONROE

SUBSCRIBED AND SWORN TO BEFORE

ME, on the day of

(Signature)

LeTicia Lee

Signature Mere dill M. Const

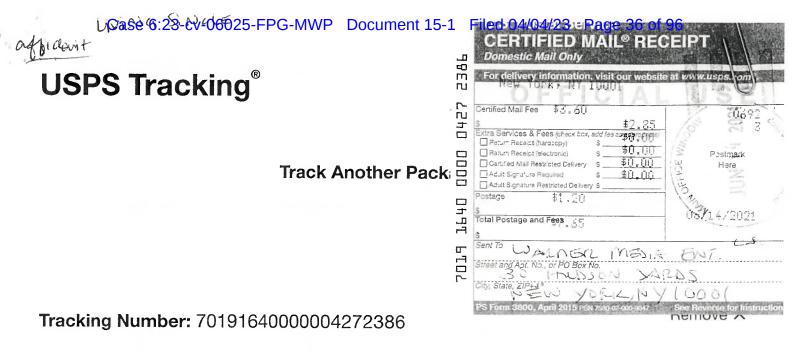
(Seal)

NOTARY PUBLIC

My Commission expires:

Meredith Marie Constantino Notary Public, State of New York No. 01CO6296641 Qualified in Monroe County

Commission Expires Feb. 10, 20_



Your item was delivered to the front desk, reception area, or mail room at 12:54 pm on June 17, 2021 in NEW YORK, NY 10001.

Delivered, Front Desk/Reception/Mail Room June 17, 2021 at 12:54 pm NEW YORK, NY 10001 Get Updates Text & Email Updates Tracking History Product Information

See Less ∧

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.



CASE # 6,23 - CV - 0602 5- FPG-MWP

LeTicia Lee

dba SoRichIam Media

1335 Jefferson Rd #20711

Rochester, New York 14602 USA

Plaintiff

-VS-

Grammnet Productions

Attn: Allen Kelsey Grammer

2461 Santa Monica Blvd. #521

Santa Monica, CA 90404

Defendant

E. G2 6/85.

Case #6:23-cv-06025-FPG-MWP (Case ID Number)

AFFIDAVIT

I, LeTicia Lee, dba SoRichIam Media 1335 Jefferson Rd #20711 Rochester, New York 14602 USA in Monroe County, New York, MAKE OATH AND SAY THAT:

- 1. Grammet Productions (formerly also known as Happy Camper Prods) used my original sitcom treatment, "GIRLFRIENDS" (c) 1991 to develop, produce, and distribute GIRLFRIENDS sitcom for profit (See Exhibit A).
- 2. Grammet Productions (formerly also known as Happy Camper Prods) used my original sitcom treatment, "GIRLFRIENDS" (c) 1991 to develop, produce, and

- distribute GIRLFRIENDS sitcom through UPN and The CW networks and/or possibly additional networks in its first run 2000-2008 for profit.
- 3. Grammet Productions (formerly also known as Happy Camper Prods) used my original sitcom treatment, "GIRLFRIENDS" (c) 1991 to develop, package and distribute GIRLFRIENDS sitcom in syndication via Netflix for profit.
- 4. Grammet Productions (formerly also known as Happy Camper Prods) used my original sitcom treatment, "GIRLFRIENDS" (c) 1991 to develop, package and distribute GIRLFRIENDS sitcom to networks in syndication to various markets nationwide for profit.
- 5. Grammet Productions (formerly also known as Happy Camper Prods) knowingly used my original sitcom treatment, "GIRLFRIENDS" (c) 1991 to develop, package and distribute GIRLFRIENDS sitcom to various networks in syndication in markets worldwide for profit
- 6. In 1991, I (and then writing partner Tracey Moore) pitched GIRLFRIENDS (C) 1991 sitcom to producers and networks while visiting Los Angeles, CA.
- 7. In 1991, while in Los Angeles, CA, Tracey Moore and I had lunch with Warren Hutcherson our former "friend" and Brooklyn neighbor and then rising comedic writer who later became an Executive Producer at Warner Bros, where and when we "practiced" our pitch for GIRLFRIENDS (C) 1991 and showed him our treatment.
- 8. In 1991, my then writing partner, Tracey Moore, and I had a pitch meeting in good faith with Karen Handel who was then VP of Casting and Films & Original Programming Exec at HBO Premiere then located at 2049 Century Park East Suite #4100 while in Los Angeles, CA where and when we pitched an ensemble sitcom called GIRLFRIENDS (c) 1991.
- 9. GIRLFRIENDS (c) 1991 was loosely based on our own lives as young middle class women of color and the roller coaster events that occurred being twenty something and living in the fast paced environment of New York City while balancing rising careers and personal lives.
- 10. In 1991, HBO Exec, Karen Handel, asked if Tracey and I would be open to considering an all white cast for GIRLFRIENDS (c) 1991.

- 11. In 1991, Tracey and I told Karen Handel at HBO that we preferred to originate an urban show for middle class women of color and the challenges they faced balancing life and career as there hadn't been a middle class urban twenty something ensemble seen on television like GIRLFRIENDS (c) 1991 but would consider the alternative only if/after all the initial attempts for an urban cast were exhausted.
- 12. Karen Handel of HBO then asked Tracey and I to send her what an "ideal first season" would look like for GIRLFRIENDS (c) 1991.
- 13. In 1991, Tracey Moore and I left a treatment for GIRLFRIENDS with Karen Handel at HBO in Los Angeles, CA a six person ensemble composed of three female leads and three supporting men in their twenties in various comedic situations trying to balance life and career most of whom lived in Brooklyn, New York.
- 14. Tracey and I returned to New York from Los Angeles in 1991 and wrote a proposed "outline for an ideal first season on spec" for GIRLFRIENDS (c) 1991 and sent it back to Karen Handel at HBO in Los Angeles, CA.
- 15. During that LT 'E meeting with Karen Handel at HBO in Los Angeles, CA, Tracey and I also shared several real-life somewhat comedic incidents that occurred amongst we and our community of friends (Forte Greene Brooklyn, NY) many of whom became celebrities themselves including our ritual of meeting at a place called Mike's Cafe where all the urban "upstarts" and professionals met every Saturday and Sunday to commune, complain, and network for and about industry work/jobs (arts, editorial, film and television) which inevitably spilled into personal relationships.
- 16. In 1994, our show GIRLFRIENDS was abbreviated to a show called FRIENDS supposedly "written by" two HBO writers, David Crane and Marta Kauffman which they initially called, Six in One (which was our six person ensemble under one roof) and directed by James Burrows by request of Warren Littlefield at NBC.
- 17. Ironically, Warren Littlefield, then head NBC, was seeking a show like "Living Single" which was also derived from GIRLFRIENDS and produced by our former "friend" and Brooklyn neighbor, Warren Hutcherson, whom we had pitched GIRLFRIENDS and left a written treatment during our visit to Los Angeles, CA in 1991 while he was an up and coming comedic writer then struggling to make a name for himself in Hollywood/Los Angeles, CA.

- 18. Circa 1993-1994, Warren Littlefield, then head of NBC, hired two HBO writers (David Crane and Marta Kauffman) who brought a television sitcom concept they called (Six in One) which was GIRLFRIENDS (six person ensemble under one roof) from the HBO's shelved archives.
- 19. Les Moonves (then head of Warner Bros) approved the FRIENDS ensemble series with James Burrows (Cheers and Frasier director) at the helm to direct the FRIENDS' pilot episode in 1994.
- 20. FRIENDS' sitcom Pilot Director, James Burrows (Cheers and Frasier director), used the original GIRLFRIENDS (c) 1991 treatment as a template to launch FRIENDS 1994 sitcom which successfully aired 1994-2004
- 21. FRIENDS' sitcom Pilot Director, James Burrows (Cheers and Frasier director) appears to have shared the original GIRLFRIENDS treatment/specs etc with his "friend" Allen Kelsey Grammer (aka Kelsey Grammer), lead character in James Burrow's sitcom FRASIER 1993-2004
- 22. Kelsey Grammer used his FRASIER fame and platform to Produce works himself in that 1993-2004 timeframe.
- 23. Kelsey Grammar went on to develop and produce the "original FRIENDS template" GIRLFRIENDS (c) 1991 which aired in nearly close to GIRLFRIENDS original treatment, concept, specs and pitch format using the SAME show title which aired on UPN and then The CW from 2000-2008.
- 24. Kelsey Grammer, Mara Brock, Akil, and Salim Akil mis-represent themselves as the originators behind the sitcom GIRLFRIENDS which had been floating around Hollywood for nearly a decade as a success template for an intelligent twenty something middle class urban comedic ensemble which was loosely based on my original GIRLFRIENDS (c) 1991 concept and loosely based on my personal life and incidents.
- 25. Grammet Productions (formerly also known as Happy Camper Productions) misrepresents itself as the originator behind the sitcom entitled GIRLFRIENDS.
- 26. Grammet Productions (formerly also known as Happy Camper Prods) and its CEO, Kelsey Grammer, knowingly attached his name to the GIRLFRIENDS sitcom (c) 1991 project owned by two black female writers and producers, LeTicia Lee and Tracey Moore, and called it his own thus profiting himself, UPN, The CW, and now Netflix and others and sister networks and markets worldwide in syndication without getting our (original said owners) permission, giving us onscreen credit, and without financial compensation even though we had clearly registered and copyrighted. the material as it circulated around the Hollywood community with its original

- GIRLFRIENDS name and concept with our concept creator names. LeTicia Lee and Tracey Moore, on the cover sheet.
- 27. The character JOAN in Grammnet Productions/Happy Camper/Kelsey Grammer's version of GIRLFRIENDS is loosely based on our character MONIQUE a strong independent Producer who was loosely based on my personal life as a NYC Indie Producer who had a general understanding of Business and Law (which you can see herein).
- 28. TONI and MAYA were actually one character, TERRI in our GIRLFRIENDS treatment and pitch
- 29. LYNN was the airhead character Erika in our GIRLFRIENDS treatment and pitch
- 30. WILLIAM is a composition of all three men in our version (Robert, Tony and Bobbi) in our GIRLFRIENDS sitcom
- 31. Our original GIRLFRIENDS female ensemble met in college, NYU.
- 32. Grammet Productions/Happy Camper GIRLFRIENDS' female ensemble leads also met in college.
- 33. The GIRLFRIENDS names and location changed but character descriptions, show concept, and program title remained the same.
- 34. Grammet Productions and its Executive Producer, Kelsey Grammer, appears to have attempted to deceive, cover up and bypass the original creators of GIRLFRIENDS by bringing Mara Brock Akil and Salim Akil on board
- 35. I do not know nor have I ever met Mara Brock Akil and/or Salim Akil who claim to have "created" the sitcom GIRLFRIENDS
- 36. Grammet Productions, Happy Camper Prods, and its Executive Producer, Allen
 "Kelsey Grammer" displayed a blatant disrespect for young and aspiring black female
 writers and producers in their intentional decision not to acknowledge the original
 creators of the registered intellectual property, GIRLFRIENDS, from which they and
 their cast and crew profited for over twenty years.
- 37. Grammet Productions and its Executive Producer, Allen "Kelsey Grammer" appear to have used deceptive practices to "develop" and distribute GIRLFRIENDS sitcom as their own "original work" to various networks and markets.
- 38. Grammet Productions and its Executive Producer, Kelsey Grammer perpetuate systemic racism by not acknowledging the creative work, GIRLFRIENDS sitcom was originated by LeTicia Lee and Tracey Moore (c) 1991 two professional women of color whom Grammet Productions and Kelsey Grammer excluded while exploiting the gifts and talents / works created by Ms. Lee and Ms. Moore from which they, Grammet Productions, Kelsey Grammer, Mara Brock Akil and Salim Akil et al profited.

- 39. I am seeking \$175,000,000 (\$100,000,000 payable to me, LeTicia Lee dba SoRichlam Media, and \$75,000,000 payable to Tracey Moore) in lost wages/income/revenues and emotional damages for the extreme distress this has caused me for over twenty years trying to trace how my intellectual property GIRLFRIENDS (c) 1991) got to Grammet Productions (formerly Happy Camper Productions) via Allen "Kelsey Grammer", Mara Brock Akil and Salim Akil, UPN, The CW and now Netflix and other networks worldwide in syndication in nearly its original form with out my personal approval or consent or that of my then writing partner, Tracey Moore's consent or approval with whom I have discussed these above written claims.
- 40. I am also seeking 5% (2.5% payable to LeTicia Lee dba SoRichIam Media and 2.5% payable to Tracey Moore) of all future gross revenues derived from GIRLFRIENDS sitcom television, streaming, film, syndication, merchandising and/or any future ancillary markets and gross revenues derived from the overall GIRLFRIENDS sitcom production franchise in any current form or any form/format yet to be created.
- 41. No amount of money can fully compensate the emotional pain and suffering Tracey Moore and I have each experienced watching our work being exploited for nearly thirty years without compensation.
- 42. You have thirty (30) days from the postal date received to respond to the above claims. Thank you.

STATE OF NEW YORK

COUNTY OF MONROE

SUBSCRIBED AND SWORN TO BEFORE ME, on the 11th day of 2021

Signature

NOTARY PUBLIC

My Commission expires:

2/10/2027

Meredith Marie Constantino
Notary Public, State of New York
No. 01CO6296641
Qualified in Monroe County
Commission Expires Feb. 10, 20

(Signature)

LeTicia Lee

(G3)	
CASE # 6:23-CV-06025-FPG-MUF	0

LeTicia Lee dba SoRichIam Media

1335 Jefferson Road #20711

Rochester, New York 14602 USA

Plaintiff

-vs-

Warner Media 30 Hudson Yards New York, NY 10001

Defendant

Case #6:23-cv-06025-FPG-MWP

(Case ID Number)

AFFIDAVIT

I, LeTicia Lee dba SoRichlam Media , 1335 Jefferson Rd #20711 Rochester, NY 14602 in Monroe County, New York, MAKE OATH AND SAY THAT:

- 1. Warner Bros. used my treatment, "Girlfriends" (C) 1991 to develop, produce and distribute, "Friends" sitcom (See Exhibit A) for profit.
- 2. Warner Bros. used my treatment, "Girlfriends" (C) 1991 to develop, produce and distribute "Friends" sitcom which aired on NBC for profit.
- 3. Warner Bros. used my treatment, "Girlfriends" (C) 1991to package, and distribute "Friends" sitcom in syndication to HBOMax for profit.

- 14. During that live 1991 meeting, Tracey and I shared several REAL-life comedic SITUATIONS that occurred in our own lives and amongst our community of friends (Forte Greene Brooklyn, NY) including our meet ups at a place called Mike's Cafe where all the urban "upstarts" and professionals gathered every weekend for brunch to commune, complain about our personal lives and network for and about industry work/jobs (arts, editorial, film and television etc).
- 15. In 1994, our GIRLFRIENDS sitcom was abbreviated to a show called FRIENDS supposedly "written by" two HBO writers, David Crane and Marta Kauffman which they initially called Six in One (which was our six person ensemble under one roof) and developed upon request for Warren Littlefield then Head of NBC.
- 16. Ironically, Warren Littlefield, then head NBC, was "publicly" seeking a show like "Living Single" which was also derived from GIRLFRIENDS as it was produced by our former "friend" and Brooklyn neighbor, Warren Hutcherson, who we had also pitched GIRLFRIENDS in 1991 during our visit to Los Angeles, CA while he was still an up and coming comedic writer struggling in Los Angeles.
- 17. Les Moonves approved the "FRIENDS" sitcom ensemble with James Burrows (Cheers and Frasier director) at the helm to direct the pilot episode in 1994.
- 18. FRIENDS was a hit and remained on the air at NBC from 1994-2004 garnering over one billions in advertising dollars, DVD sales and merchandising.
- 19. FRIENDS continues to air worldwide in syndication.
- 20. FRIENDS is now being renewed and streams online on HBOMax in syndication.
- 21. James Burrows (friend to Kelsey Grammer, lead character of his hit tv show FRASIER) appears to have shared GIRLFRIENDS treatment and show concept from which FRIENDS is derived with his "friend" Allen "Kelsey Grammer".
- 22. Kelsey Grammar went on to Produce the "original FRIENDS template", GIRLFRIENDS (C) 1991 which aired on UPN and then the CW from 2000-2008.
- 23. Warner Bros appears to have participated in and PROFITED from Hollywood's long standing practice of deception and cover ups by allowing its FRIENDS Producers to knowingly use GIRLFRIENDS (C) 1991 sitcom treatment created by LeTicia Lee and Tracey Moore and intentionally changing the show title name from GIRLFRIENDS to FRIENDS so as not to credit or compensate the original show creators, LeTicia Lee and Tracey Moore.
- 24. Warner Bros. and its producers participated in, and PROFITED from Hollywood's long standing practice of systemic are racism by believing they could intentionally bypass LeTicia Lee and Tracey Moore, two women of color, who are the original writers and producers of GIRLFRIENDS (C) 1991 which was used to create FRIENDS 1994 sitcom for national and worldwide distribution.
- 25. Warner Bros. and its producers appear to have knowingly participated in, and PROFITED from Hollywood's long standing practice of gender bias by believing they could intentionally bypass LeTicia Lee and Tracey Moore, two women of color, who are the original writers and producers of GIRLFRIENDS (C) 1991 which was used to create FRIENDS 1994 sitcom for national and worldwide distribution.

Text & Email Updates Tracking History **Product Information**

See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.



LeTicia Lee dba SoRichIam Media

1335 Jefferson Rd. #20711

Rochester, New York 14602

Plaintiff

-VS-

Warner Media for HBO Inc. 30 Hudson Yards New York, NY 10001

Defendant

Q. G4 5085,

Case #6:23-cv-06025-FPG-MWP

(Case ID Number)

AFFIDAVIT

I, LeTicia Lee dba SoRichIam Media, of Rochester, New York in Monroe County, New York, MAKE OATH AND SAY THAT:

- Warner Media's company HBO used my original treatment, "Girlfriends" (C) 1991 to create the series, "Sex and the City"
- 2. In 1991, my then writing partner, Tracey Moore, and I had a private pitch meeting in good faith with Karen Handel who was then VP of Casting and Films & Original Programming at HBO then located at 2049 Century Park East Suite 4100 while in in Los Angeles, CA.
- 3. In 1991, Tracey Moore and I pitched our show entitled GRIRLFRIENDS (C) 1991 to Karen Handel at HBO which was a six person situational comedic ensemble about three upwardly mobile women in their twenties who met at NYU and how they balanced life, career, and

- relationships while living in New York City. The ensemble also included three supporting male characters. Most of the ensemble lived under one roof in a New York Brownstone. (See Exhibit A)
- 4. In 1991, Karen Handel asked if Tracey and I would consider an all white cast, but we preferred to originate an urban show for middle class women and urbanites trying to balance life and career at that time before considering the latter typical option of an all white cast.
- 5. In 1991, Karen Handel asked Tracey and I to write what an "ideal first season" would look like for GIRLFRIENDS.
- 6. In 1991, Tracey Moore and I left a treatment for the sitcom, GIRLFRIENDS, with Karen Handel at HBO a six person ensemble composed of three women and three men who met while studying at NYU surviving and sometimes thriving in their twenties in various comedic situations trying to balance life and career during our meeting with Karen in Los Angeles, CA many of which were comical incidents based on our own personal lives many of which we shared/discussed with Karen during our live pitch meeting.
- 7. In 1991, Tracey and I returned to New York and wrote an outline "on spec" for the first season of GIRLFRIENDS.
- 8. Carrie and Miranda of SEX and the CITY are based on one character, Monique in GIRLFRIENDS (me). Most people (in Hollywood) don't/didn't believe a young heterosexual woman could be attractive and intelligent enough to have a general understanding of the business and law so I suppose HBO decided to make her (Monique) two different people, Carrie and Miranda, instead.
- 9. The character, Charlotte in Sex and the City, is Erika (GIRLFRIENDS) which was based on my writing partner, Tracey Moore.
- 10. Samantha is based on a story line we pitched in an episode from our "ideal first season" about how the characters met men at a nightclub, flirted with them, and tossed them back into the "ocean" like fish at the end of the night and went home. Clearly, it was Karen Handel's and HBO's "misperception" and an exaggeration of GIRLFRIENDS' characters and the spec story line we sent.

- HBO in 1998 to develop a series about twenty something single girlfriends who met at NYU and how they balanced career and life in a little show called SEX and the CITY
- 20. Ironically, when James Burrows (director of Cheers and Frasier) directed the pilot episode for FRIENDS "written by" HBO writers David Crane and Marta Kauffman, he shared the actual GIRLFRIENDS treatment with Kelsey Grammer who appears to have then developed and Produced the treatment under its original name, GIRLFRIENDS.
- 21. Between late 2020 to early 2021, I was finally able to trace Kelsey Grammer's version of GIRLFRIENDS back to David Crane and Marta Kauffman, then writers at HBO.
- 22. SEX and the CITY television series, DVDs, films and ancillary markets have grossed over one billion dollars in revenues and continues to succeed worldwide in syndication because of the original treatment, GIRLFRIENDS (c) 1991 pitched to Karen Handel at HBO in 1991 and used by HBO, Warner Bros, NBC, UPN, The CW, Netflix, HBOMax and others in syndication worldwide.
- 23. HBO knowingly used my original treatment and spec outlines from GIRLFRIENDS (C) 1991 to create "Sex and the City".
- 24. HBOMax has agreed to stream FRIENDS derived from GIRLFRIENDS discovered on the HBO shelved archives on its network.
- 25. Warner Media/ HBO appears to have knowingly participated in Hollywood's long standing practice of deception and cover-ups by creating a "back story" for Sex and the City" as being derived from an original book idea rather than stolen from a show they shelved, GIRLFRIENDS (C) 1991 created by LeTicia Lee and Tracey Moore.
- 26. Warner Media/HBO appears to have participated in Hollywood's long standing practice of gender bias by not acknowledging Tracey Moore and LeTicia Lee two talented women of color and the original writers and producers of GIRLFRIENDS from which the series "Sex and the City" was developed, produced, packaged and distributed worldwide for profit.
- 27. Warner Media/HBO appears to have participated in Hollywood's long standing practice of systemic racism by not acknowledging Tracey Moore and LeTicia Lee two talented women of color and the original writers and producers of GIRLFRIENDS from which the series "Sex and the City" appears to have been developed, produced, packaged and distributed worldwide for profit.
- 28. I am seeking \$750,000,000 restitution for lost wages/income/revenues (\$500,000,000 payable to LeTicia Lee dba SoRichIam Media and \$250,000,000 payable to Tracey Moore), for emotional damages and the extreme amount of distress I have experienced for nearly thirty years wondering how my original treatment and scripts for GIRLFRIENDS went from a private pitch meeting at HBO in good faith with Karen Handel to UPN and The CW by way of two HBO writers (David Crane and Maria Kaufmann) who used GIRLFRIENDS (c) 1991 to create a massive success series called FRIENDS and how HBO intentionally tried to deceive the industry and general public into believing the series "Sex and the City" was an Original HBO Program by contriving

a book and thus "backstory" by a white female writer, Candace Bushnell and her "column" just to avoid acknowledgement and compensation to two talented black female writers and producers due to HBO's support, agreement, and alliance with traditional long standing Hollywood Industry systemic discriminatory practices.

- 29. In addition, I also seek 5% of all future gross revenues (2.5% payable to LeTicia Lee dba SoRichlam Media and 2.5% payable to Tracey Moore) from any current and/or future "Sex and the City" television/film franchise, online streaming, merchandising and any future market opportunities and ancillary markets yet to be created from which the "Sex and the City" series franchise may profit.
- 30. Tracey and I both experienced immense emotional hardship from this experience which no amount of money can fully compensate.
- 31. You have thirty (30) days from the postal date received to respond to the above mentioned claims. Thank you.

STATE OF NEW YORK

COUNTY OF MONROE

SUBSCRIBED AND SWORN TO BEFORE

ME, on the 11th day of 2021

Signature Mere differ Constatus

(Seal)

NOTARY PUBLIC

My Commission expires:

Meredith Marie Constantino
Notary Public, State of New York
No. 01CO6296641
Qualified In Monroe County
Commission Expires Feb. 10, 20

(Signature)

LeTicia Lee

Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23 Page 50 of 96

Ex. H SPSS

Case #6:23-cv-06025-FPG-MWP

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF MONROE

Index No.: 2001-3189

Plaintiff(s) designates

LETICIA LEE DBA SORICHIAM MEDIA.

Claimant.

MONROE
County as the place of trial

SUMMONS

Claimant designates MONROE COUNTY as the place of Trial

-against-

The basis of this venue is: Claimant's place of business SoRichlam Media 1335 Jefferson Rd #20711 Rochester, NY 14602

WARNER BROS. TELEVISION GROUP, WARNER MEDIA LLC/HBO, COMCAST/NBC UNIVERSAL TELEVISION GROUP VIACOM/CBS. GRAMMNET PRODUCTIONS

Respondents,	•
To the above named Respondent(s)	X

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

I, LeTicia Lee dba SoRichIam Media, of Rochester, New York in Monroe County, New York, MAKE OATH AND SAY THAT:

1. Warner Media/HBO, Comcast/NBC, Grammnet Prods, and Viacom/CBS intentionally used and profited from my original treatment, and pilot script about an original sitcom ensemble in their twenties balancing life and career in a metropolitan city most of whom lived in one building entitled GIRLFRIENDS(C) 1991, as well as conversations spoken in good faith about my character and personal life during pitch meetings to create, develop, and distribute the series: Living Single (1993-1998), Friends (1994-2004), Sex and the City (1998-2004), and Girlfriends (2000-2008) all currently still airing in syndication in multiple markets worldwide.

AUG 1 1 2021 Monroe County

- 2. In March-April 1991, while doing preliminary research for Spike Lee's biopic MALCOLM X, I had multiple telephone conversations with Lucy Fisher at Warner Bros. who referred me to Shelly Raskov at Warner Bros Television with whom I spoke and pitched a sitcom pilot I had been working on with my then writing partner, Tracey Moore, entitled GIRLFRIENDS and told her we would be in Los Angeles. CA from the last week in April through the first week in May 1991 and could meet to further discuss.
- 3. Tracey Moore and I did visit Los Angeles. CA in the Spring of 1991 and first had a social lunch with our former friend and neighbor, an up and coming Brooklyn comic/comedy writer, Warren Hutchins who was working on a sitcom pilot. We shared updates on our personal and business lives, and practiced our pitch for our original series ensemble, GIRLFRIENDS before meeting with Producers.
- 4. On May 1, 1991, my then writing partner, Tracey Moore, and I also had a pitch meeting in good faith with Karen Handel who was then VP of Casting and Films & Original Programming at HBO then located at 2049 Century Park East Suite 4100 while in in Los Angeles, CA.
- 5. In 1991, Tracey Moore and I pitched our show entitled GIRLFRIENDS (C) 1991 to Karen Handel at HBO which was mainly a six person ensemble composed of three women and three men who met while studying at NYU surviving and sometimes thriving in their twenties despite various comedic situations while trying to balance life and career during our meeting with Karen in Los Angeles, CA many of which were comical incidents based on our own personal lives many of which we shared/discussed with Karen during our live pitch meeting.
- 6. In 1991, Karen Handel asked if Tracey and I would consider an all white cast, but we preferred to originate an urban show for middle class women and urbanites trying to balance life and career at that time before considering the latter typical option of an all white cast.
- 7. In 1991, Karen Handel asked Tracey and I to write what an "ideal first season" would look like for GIRLFRIENDS.
- 8. In May of 1991, Tracey Moore and I returned to New York and wrote and sent an outline "on spec" for the first season of GIRLFRIENDS to Karen Handel at HBO never to hear from her again.

- 9. In 1993, Warren Hutchins produced a pilot for a sitcom entitled. LIVING SINGLE, about a four urban women and two men balancing life and career with strikingly similar character descriptions and stories we pitched to him from GIRLFRIENDS.
- 10. While LIVING SINGLE aired at Warner Bros, it became publicly known that Warren Littlefield was looking for a "white version" of the "Living Single" sitcom for NBC.
- 11. Ironically, in **1994 Warren Littlefield** hired two HBO writers, David Crane and Marta Kauffman who had access to "shelved archives/pitches/works" at HBO.
- 12. David Crane and Marta Kauffman pitched a show they called "Six in One" to Warren Littlefield and then Les Moonves at NBC about an ensemble of three women and three men in their twenties who lived under one roof in New York City who met regularly at a cafe to discuss life, career and relationships which was *strikingly similar* to the show, GIRLFRIENDS, Tracey Moore and I pitched to Karen Handel at HBO in 1991 including the facts of or personal lives that we and our friends met at a film/tv/arts crew industry favorite Brooklyn cafe called, Mike's.
- 13. Warren Littlefield hired David Crane and Marta Kauffman to write the pilot episode and series they eventually just called, **FRIENDS** and selected **James Burrows** (who also directed "Cheers" and "Frasier") to direct the **FRIENDS** pilot episode.
- 14. It appears James Burrows was so pleased with FRIENDS' sitcom fame and success and how "lucky" the now famous GILRFRIENDS template was for he and others (LIVING SINGLE and now FRIENDS) that it appears James Burrows shared the story with his friend, Allen "Kelsey Grammer" (Frasier sitcom lead star)
- 15. In 2000, Kelsey Grammer developed and produced GIRLFRIENDS using a "strikingly similar" treatment/notes Tracey Moore and I shared with Karen Handel at HBO (including title) only changing character names and location from New York City to Los Angeles.
- 16. Warner Media/HBO, Warner Bros Television, Comcast/NBC, Viacom/CBS and Grammnet Productions appear to have knowingly participated in Hollywood's long standing practice of deception and cover-ups by calling original works created by under-represented content creators their own.

- 17. Warner Media/HBO, Warner Bros Television, Comcast/NBC, Viacom/CBS and Grammnet Productions appear to have participated in Hollywood's long standing practice of **gender bias** by not acknowledging Tracey Moore and LeTicia Lee two talented women of color and the original writers, creators and producers of GIRLFRIENDS from which the series: "Living Single", "Friends", "Sex and the City", and "Girlfriends" were all developed, produced, packaged and distributed worldwide for fame, profit and fortune.
- 18. Warner Media/HBO, Warner Bros Television, Comcast/NBC, Viacom/CBS and Grammnet Productions appear to have participated in Hollywood's long standing practice of systemic racism by not acknowledging Tracey Moore and LeTicia Lee two talented women of color and the original writers, creators and producers of GIRLFRIENDS from which the series: LIVING SINGLE, FRIENDS, SEX AND THE CITY and GIRLFRIENDS appear to have been developed, produced, packaged and distributed worldwide for profit.
- 19. I am seeking \$750,000,000 restitution for recoverable lost wages/income/revenues for the last three years (\$400,000,000 payable to LeTicia Lee dha SoRichIam Media and \$350,000,000 payable to Tracey Moore) for copyright infringement from all LIVING SINGLE, FRIENDS, SEX AND THE CITY and GIRLFRIENDS syndication revenues, and for emotional damages and the extreme amount of distress of years wondering how my original treatment, pilot script for GIRLFRIENDS and notes about my personal character and private life went from pitch meetings in good faith with Shelly Raskov, Warren Hutchinson, and Karen Handel to two to create "strikingly similar" massive success sitcom ensemble series including: LIVING SINGLE, FRIENDS, SEX AND THE CITY and GIRLFRIENDS from which Warner Bros Television, Warner Media, HBO, NBC, Viacom/CBS and Grammnet Productions have all profited abundantly.
- 21. Warner Media/HBO, Warner Bros Television, Comcast/NBC, Viacom/CBS and Grammnet Productions appear to have knowingly avoided acknowledgement and compensation of two talented black female writers and producers. LeTicia Lee dba SoRichlam Media and Tracey Moore to support and create an alliance with traditional long standing Hollywood Industry systemic discriminatory practices which deeply effected their career and personal lives.
- 22. In addition, I also seek 10% of all future gross revenues (5% payable to LeTicia Lee dba SoRichIam Media and 5% payable to Tracey Moore) from any current and/or future LIVING SINGLE, FRIENDS, SEX AND THE CITY and GIRLFRIENDS television/film franchise, online streaming, merchandising and any future market opportunities or offshoots and ancillary markets yet to be created from which the LIVING SINGLE, FRIENDS, SEX AND THE CITY and GIRLFRIENDS series franchises may profit

- 23. Tracey and I both experienced immense emotional hardship from this experience which no amount of money can fully compensate.
- 24. You have thirty (30) days from the postal date received to respond to this notice of claims served. Thank you.

Dated: July 23st, 2021

Signed.

LeTicia Lee

Respondent(s) Address(es):

Warner Media LLC 30 Hudson Yards New York, New York 10001

Warner Bros. Television Group 400**0**Warner Blvd. Burbank, CA 91522-0001

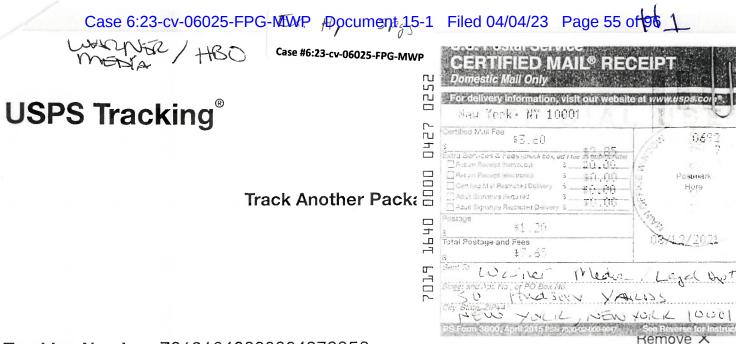
Comcast/NBC Universal Television 30 Rockefeller Plaza New York, New York | 10 | 12

Viacom/CBS 1515 Broadway New York, New York 10036

Grammet Productions Attn: Allen Kelsey Grammer 2461 Santa Monica Blvd. #521 Santa Monica, CA 90404 LeTicia lee dba SoRichlam Media Claimant

1335 Jefferson Rd. #20711 Rochester, NY 14602 USA

585-405-5555



Tracking Number: 70191640000004270252

Your item was delivered to the front desk, reception area, or mail room at 2:00 pm on August 16, 2021 in NEW YORK, NY 10001.

✓ Delivered, Front Desk/Reception/Mail Room August 16, 2021 at 2:00 pm NEW YORK, NY 10001 Text & Email Updates Tracking History Product Information ✓ The product Information ✓ Tracking History Tracking History

Can't find what you're looking for?

See Less ∧

Go to our FAQs section to find answers to your tracking questions.

Tracking Number: 70191640000004270351

Your item was delivered to the front desk, reception area, or mail room at 9:31 am on August 16, 2021 in BURBANK, CA 91522.

ঔ Delivered, Front Desk/Reception/Mail Room

August 16, 2021 at 9:31 am BURBANK, CA 91522

Get Updates ✓

Text & Email Updates

Tracking History

Product Information

See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

ack

remove A

	16.7.1.7.10.10.10.10.10.10.10.10.10.10.10.10.10.	
MAIL® RECEI		
MARKET THE STREET	Extra Santos & Fees organism and Person of Per	
ካካፎዐ ረ;	240 0000 0494 6407	

A. Signature A. Signature X.	D. Is delivery address different from item 1? 🔲 Yes' If YES, enter delivery address below: 🗀 No	3. Service Type Adult Signature Certified Mail Certified Mail Estricted Delivery Collect on Delivery Restricted Delivery Cover \$500) Application Adult Express® Consider Mail Collect on Delivery Collect	Domestic Patrice Control
SENDER: COMPLETE THIS SECTION Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.	Carrenat / 2 3 C LECTION SERVE 30 22 CK Selver 1525	2. Article Number (Transfer from service label) 0.19 1.640 0.000	2908-000-20-000 i kin i 020- 6 1

EX H

Case #6:23-cv-06025-FPG-MWP

9	U.S. Postal Service" CERTIFIED MAIL® RECE	IPT
0356	For delivery information, visit our website at figury York / NY 10036	www.usps.com®
0427	Cartified Mail Fee 27, 50	0.692
0000		Pastmark Here
1640	Postage #1 . Till S Total Postage and Fees	08/12/2021
7019	Street and Apr. No. of PO Ser No.	Legal Bapt

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: 	A. Signature X Agent Addressee B. Received by (Printed Name) C. Date of Delivery J. J. J. J. Ses If YES, enter delivery address below: No
Light sept. 1515 Freichung 1910 10036	II 125, once desire, and a second sec
9590 9402 6239 0265 0352 98 2. Article Number (Transfer from service label)	3. Service Type Adult Signature Adult Signature Restricted Delivery Certified Mail® Certified Mail Restricted Delivery Collect on Delivery Collect on Delivery Restricted Delivery Insured Mail
7019 1640 0000 0427 0368 PS Form 3811, July 2020 PSN 7530-02-000-9053	Insured Mail Restricted Delivery (over \$500) Domestic Return Receipt

4

Case #6:23-cv-06025-FPG-MWP

រ	U.S. Postal Service™ CERTIFIED MAIL® REC	EIPT
037	For delivery information, visit our website	at www.usps.com*.
0427	Certified Mail Fee S Extra Services & Fees (neck por, add fee at expediture) Therum Recent chardness () S \$11,011	0843
0000	Return Percent Recotonic	Postmark T Here
7,640	Postage \$ \$1,70 Total Postage and Fees \$ \$7,450	03/12/2 021
7019	Street and Api No. or PO Box No. 24 6 5 5 7 7 6 7 WINC	425 7 74
	or some control of the control of th	A Schod See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: Charmoniet Prod S. Cotto: Aller Juliary Charmoniet. 2461 Santa Mona and Charlet.	A. Signature X
9590 9402 6239 0265 0353 04 2. Article Number (Transfer from service label) 7 1640 0000 0427 0375	3. Service Type □ Adult Signature □ Adult Signature Restricted Delivery □ Certified Mail® □ Collect on Delivery □ Collect on Delivery Restricted Delivery □ Insured Mail Restricted Delivery □ Insured Mail Restricted Delivery □ (over \$500)
F 3811, July 2020 PSN 7530-02-000-9053	Domestic Return Receipt :

5

Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23 Page 60 of 96.

REQUEST FOR JUDICIAL INTERVENTION

(rev. 07/29/2019)

SUPREME COURT, COUNTY OF MONROE

/	Index No: 2021-3189 Dat	e Ind	dev	Issued: AUGUST	11, 2021	For Court Use Only	/ :
CA	APTION Enter the complete case caption. Do not use et al or et ano. If						
CA	Enter the complete case caption. Do not use et al or et ano. Il	more	spa	ace is needed, attacr	a caption rider sneet.	IAS Entry Date	
LE	ETICIA LEE DBA SORICHIAM MEDIA						
				ı	Plaintiff(s)/Petitioner(s)	Judge Assigned	
-aga	gainst-				(-,		
,,	ADMED MEDIA IS OUTDO WARNED BROOKELEVIOLONI OROUT				T/100 (1) (500)		
	/ARNER MEDIA LLC/HBO, WARNER BROS TELEVISION GROUP. ELEVISION GROUP, GRAMMNET PRODUCTIONS	VIA	4CC	DM/CBS, COMCAS	1/NBC UNIVERSAL		
'	ELEVISION GROUP, GRAMININET PRODUCTIONS					RJI Filed Date	
				Defer	dant(s)/Respondent(s)		
NA'	ATURE OF ACTION OR PROCEEDING Check only one box and specify who	ere in	ndica		idant(3)/ Nespondent(3)		A.
	MMERICIAL			IMONIAL			
0	Business Entity (includes corporations, partnerships, LLCs, LLPs, etc.)	0) (Contested			
0			r	NOTE: If there are child	en under the age of 18, cor	nplete and attach the	
			•	MATRIMONIAL RJI ADD	ENDUM (UCS-840M).		
0	UCC (includes sales and negotiable instruments)		F	or Uncontested Matrin	nonial actions, use the Unco	ontested Divorce RJI (UD-13).	
0		_ 10	ORTS	Martin Committee			
NO	TE: For Commercial Division assignment requests pursuant to 22 NYCRR 202.70(d),	0) A	sbestos			
-	mplete and attach the COMMERCIAL DIVISION RJI ADDENDUM (UCS-840C).	o) (hild Victims Act			
	AL PROPERTY Specify how many properties the application includes:	0) E	nvironmental (specify)			
_	Condemnation	O		Medical, Dental or Podia	atric Malpractice		
0		O		Notor Vehicle			
	Property Address:	- ŏ			ý):	*****	_
	NOTE: For Mortgage Foreclosure actions involving a one to four-family,	0		ther Negligence (speci			_
	owner-occupied residential property or owner-occupied condominium,	0		ther Professional Malp		nt,Effects & Damage	_
	complete and attach the FORECLOSURE RJI ADDENDUM (UCS-840F).	•	_		opyright infiningemen	it, Ellects & Dallage	<u>=</u>
1 -	Tax Certiorari			AL PROCEEDINGS			
	Tax Foreclosure	0		•	ion) [see <i>NOTE</i> in COMMER	CIAL section)	
	Other Real Property (specify):	- 0		PLR Article 78 (Body or	Officer)		
O	HER MATTERS	0	207	lection Law xtreme Risk Protection	Order	FILED	
0	Certificate of Incorporation/Dissolution [see NOTE in COMMERCIAL section] Emergency Medical Treatment	0	2.00	#HL Article 9.60 (Kendr			
ŏ	Habeas Corpus	ő		•	ender Confinement-Initial)	DEC 3 0 2021	
ŏ	Local Court Appeal	ŏ			ender Confinement-Review		
ŏ	Mechanic's Lien	o		/IHL Article 10 (Sex Office) /IHL Article 81 (Guardia			
ŏ	Name Change	ŏ		Other Mental Hygiene (Monroe County Clerk's Office	
ō	Pistol Permit Revocation Hearing	ō		ther Special Proceedin		Clerk's Office	
Ō	Sale or Finance of Religious/Not-for-Profit Property				0 (-1-2//		
0	Other (specify):						
STA	ATUS OF ACTION OR PROCEEDING Answer YES or NO for every ques	tion s	and	enter additional info	rmation where indicate	d. market and the second and the sec	274
317	YES YES		NO		Milete meleate		
Has	s a summons and complaint or summons with notice been filed?		0	If yes, date filed:	August 11, 2021		
	s a summons and complaint or summons with notice been served?		ō	If yes, date served:	August 12, 2021		
Is th	his action/proceeding being filed post-judgment?		0	If yes, judgment da	te:		
_	TURE OF JUDICIAL INTERVENTION Check one box only and enter ad	dition	nal i	nformation where in	ndicated		e.
0		010101	101	mornidadi where it	iaicateat	107	
	·					222	
Ō	Note of Issue/Certificate of Readiness					8	
0	Notice of Medical, Dental or Podiatric Malpractice Date Issue Joined:					(2)	
0	Notice of Motion Relief Requested:				Return Date:	ω <u>(</u>	
0	Notice of Petition Relief Requested:				Return Date:		
⊚	Order to Show Cause Relief Requested:				Return Date:	<u> </u>	
0	Other Ex Parte Application Relief Requested:						
0	Poor Person Application					E g	
0	Request for Preliminary Conference					€71 €71	
0	Residential Mortgage Foreclosure Settlement Conference					(1)	
0	Writ of Habeas Corpus					Α,	
•	Other (specify): Request tv studios compensate for itemized claims a	and d	nam	ages thereof			

Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23 Page 61 of 96

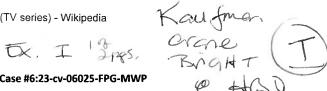
Case		Index/Case Number	and attach the RJI ADDEN		Dalastt-	
La5 6	FILE	indexy Case Number	Court	Judge (if assigned)	Relationship to inst	ant case
PAR	TTIES For parties without	an attorney, check th	e "Un-Rep" box and ente	r the party's address, phone r	umber and email in	the space provided
In			and attach the RJI ADDEN	IDUM (UCS-840A).		
Un- Rep	List parties in same order as listed in the	Attorneys and Unrep		, firm name, address, phone and	Issue Joined For each defendant,	Insurance Carriers For each defendant,
	caption and indicate roles (e.g., plaintiff		ented parties, provide party's		indicate if issue has	indicate insurance
	defendant, 3 rd party plaintiff, etc.)				been joined.	carrier, if applicable
~	Name: LeTicia Lee DBA SoRich			5 Jefferson Road #20711	O YES O NO	
_	Plaintiff	Rochester, New	York 14602 USA (505)	100 1000	O ILS O NO	
	Name: Warner Media/HBO	Warner Media LI	LC/HBO 30 Hudson Yaı	ds New York, New York		
	Role(s): Defendant	10001 Attn: Lega	al Dept./Intellectual Prop	perty	O YES O NO	
_	Name: Warner Bros Television	(Warner Bros Tol	evision Group 4000 Wa	rner Blvd. Burbank CA		
	Role(s): Defendant		: Legal Dept./Intellectua		O YES O NO	
						-
	Name: Comcast/ NBC Universa			up 30 Rockefeller Plaza	O YES O NO	
_	Defendant	New York, New	York 10112 Attn: Legal	Dept./Intellectual Property	0.120 0.110	
	Name: Viacom/CBS	Viacom/CBS 151	15 Broadway New York	New York 10036		
	Role(s): Defendant	Attn: Markus Hop	okins (626) 325-8389 M	arkus.Hopkins@cbs.com	O YES O NO	
_	Name: Grammnet Prods.	c/o Viacom/CBS	1515 Broadway New Y	ork New York 10036		
	Role(s):			arkus.Hopkins@cbs.com	● YES ● NO	
_	Defendant					
\neg	Name: Role(s):				O YES O NO	
_					O 125 O NO	
\neg	Name:					
لــ	Role(s):				O YES O NO	
	Name:					
	Role(s):				O YES O NO	
_	Name:					
	Role(s):				O YES O NO	
	Name:				OVEC ONO	
	Role(s):				O YES O NO	
_	Name:					
	Role(s):				O YES O NO	
	Name:					
	Role(s):				O YES O NO	
	Name:				O VES O NO	
	Role(s):				O YES O NO	
_	Name:					
	Role(s):				O YES O NO	
	Print a lining property of the	D11D1/2014 20 445 51	141949444444444444		DELATED ACTION	OD DECOFFEE IN ST
ı Al	FFIRM UNDER THE PENALTY OF PE					
	EXCEPT AS NOTED ABOVE, NOR H	TAS A REQUEST FUR	JODICIAL INTERVENTIO	IN DEEIN PREVIOUSLY PILED	IN THIS ACTION OF	TRUCEEDING.
	12/27/200	,		42.	100	
)at	ed: 15/5/00	1	_/	May	200	
	1		V	Sig	nature	
				LETICI	A La	
	Attorney Registr	ration Number		Prir	it Name	

3/28/23, 11:44 AM

Dream On (TV series) - Wikipedia

WikipediA The Free Encyclopedia

Case #6:23-cv-06025-FPG-MWP



Dream On (TV series)

Dream On is an American sitcom television series created by Marta Kauffman and David Crane. It follows the family life. romantic life, and career of Martin Tupper, a divorced New York City book editor played by Brian Benben. The show distinctively interjected clips from older black-and-white television series to punctuate Tupper's feelings or thoughts. It ran for six seasons on HBO between July 8, 1990, and March 27, 1996.

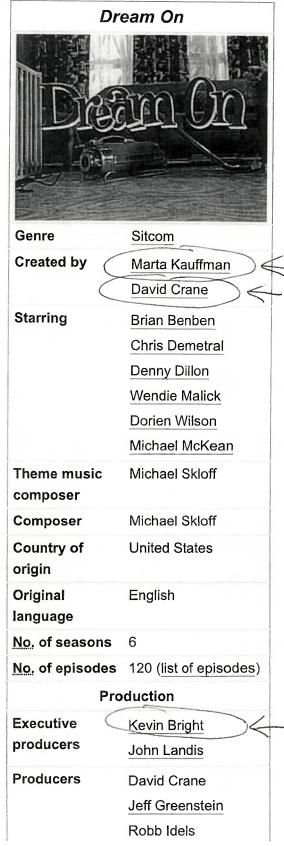
Premise

The show centered on Martin Tupper's (Brian Benben) life in an apartment in New York City with his young son, and relating to his ex-wife, while trying to date other women and succeed as an editor for a small book publisher with Toby, his brassy secretary. Judith, his ex-wife, went on to marry Dr. Richard Stone – the never-seen (until the end of the series), most impossibly successful man on the planet (astronaut, brain surgeon, the fifth Beatle and consultant to the Pope); despite Martin's undying love for Judith, he could never compete with the legendary Dr. Stone.

The opening indicates Martin's mother parked him in front of the TV and he then grew up engrossed in it. It briefly shows a babysitter making out with a boyfriend behind young Martin, hence the association of sex with his memories. The show was notable for its frequent use of clips from old movies and TV shows to express Martin's inner life and feelings, which lent it much of its quirky appeal, reminding viewers about the impact of TV on their consciousness. [1] The show was also significant for being one of the first American sitcoms to use uncensored profanity and nudity.[2]

Cast

 Brian Benben as Martin Tupper, a book editor for a smaller publishing house that usually specializes in romance novels and other less prestigious literary fare. Having practically been raised by television in the 1950s, his thoughts are shown to the viewer through clips of classic black and white programming. He struggles to find love (or something like it) while sorting out the feelings he still has for his ex-wife. Judith. [3]



Case #6:23-cv-06025-FPG-MWP

3/28/23, 11:44 AM

Dream On (TV series) - Wikipedia

Wendie Malick as Judith Tupper Stone, Martin's ex-wife
who has since remarried the literal perfect man, Dr.
Richard Stone. ^[3]

- Chris Demetral as Jeremy Tupper, Martin's teenaged son.^[3]
- Dorien Wilson (seasons 2–6) and Jeff Joseph (season 1) as Eddie Charles, a talk show host and Martin's best friend.
- Denny Dillon as Toby Pedalbee, Martin's secretary/assistant
- Michael McKean as Gibby Fiske, Martin's boss (recurring during seasons 2–6)^[3]
- Renée Taylor as Martin's mother, Doris Tupper (occasional during seasons 3–5)

Production

The show was created by Marta Kauffman and David Crane, who also served as producers. *Dream On* was executive produced by Kevin Bright and John Landis. Landis also directed several episodes of the series. *Dream On* first aired on July 8, 1990, on HBO, and was cancelled by HBO in March

	Marta Kauffman
	Jeff Strauss
	Ron Wolotzky
Camera setup	Single camera
Running time	30 min
Production companies	Kevin Bright Productions
	St. Clare Entertainment
	MCA Television Entertainment
R	elease
Original network	HBO (1990–1996) Fox (1995) (edited)
Audio format	Stereophonic sound
Original release	July 8, 1990 – March 27, 1996

1996. One season of the show, with language and nudity edited for broadcast, aired in prime time on the Fox Broadcasting Company in 1995: Sunday at 9:30-10:00 p.m. from January to April and Monday at 9:00-10:00 p.m. from June to July. [5] This bowdlerized version was later made available in syndication.

New York, MTV Networks (Headquarters), 1775 Broadway, New York, NY 10019; (212) 713-6400. Showtone Networks Inc. (Headquarters), 1633 Broadway, New York, NY 10019; (212) 703-1600.

INTERNATIONAL OFFICES

London: Viacom International Limited, 40 Conduit Street, London, England WIR 9FB; 011-441-434-4483.

Sydney: Viacom International Pty. Limited. 16th Floor, St. Martin's Tower, 31 Market Street, Sydney, N.S.W. 2000, Australia; 011-612-261-5391.

São Paulo: Viacom Video Audio Communicacoes Ltda., Alameda Jau', 1742-11 Andar, Caixa Postal 51521, 01420, São Paulo, Brazil: 011-55-11-853-4633.

Tokyo: Viacom Japan, Inc., 4F, Mitsuwa Building, 7-2 Ginza 6-Chome, Chuo-Ku, Tokyo 104, Japan; 011-813-573-0551.

Canada: 45 Charles Street, East, Toronto 5, Ontario, Canada M4Y

IS2: (416) 925-3161.

Switzerland: Viacom SA, Chamerstrasse 18, 6300 Zug, Switzerland:

011-41-42-21-8122

Warner Bros. Television

4000 Warner Blvd., Burbank CA 91522; (818) 954-6000; Telex: 4720389, 75 Rockefeller Plaza, New York, NY 10019; (212) 484-8000.

TELEVISION PROGRAMMING

PRESIDENT Harvey Shephard
EXECUTIVE VICE PRESIDENT Barry M. Meyer
VICE PRESIDENT SPECIAL PROJECTS
Karen Cooper Mingides
SENIOR VICE PRESIDENT, BUSINESS AFFAIRS Art Stolnitz
VICE PRESIDENT, SENIOR ADVERTISING, PUBLICITY &

PROMOTION EXECUTIVE

PROMOTION EXECUTIVE
Doug Duitsman
SENIOR VICE PRESIDENT, PRODUCTION
Gary Credle
VICE PRESIDENT, MOVIES FOR TELEVISION AND MINI-SERIES

Norman Stephens
VICE PRESIDENT, CURRENT PROGRAMMING

David Sacks
VICE PRESIDENT, MOVIES & MINISERIES

Gregg Maday
VICE PRESIDENT, COMEDY DEVELOPMENT

Scott Kaufer
VICE PRESIDENT, CREATIVE AFFAIRS/EAST COAST

Susan Dalismer VICE PRESIDENT, TALENT Marcia Ross

VICE PRESIDENTS, BUSINESS AFFAIRS Beverly Nix, Joe Reilly, Art Horar VICE PRESIDENT, LEGAL AFFAIRS

Milt Segal VICE PRESIDENT, FILM & TAPE PRODUCTION

Steve Papazian
VICE PRESIDENT, POST PRODUCTION

Karen Pingitore

VICE PRESIDENT, PRODUCTION & OPERATIONS

Tom Treloggen
VICE PRESIDENT, STORY & VOCATIONAL ADMINISTRATION

Gus Blackmor DIRECTOR, PUBLICITY, PROMOTION & ADVERTISING

Claire Lee
DIRECTOR, FINANCIAL ADMINISTRATION
Rosalee Jeffries
DIRECTOR, TV ESTIMATING
Mike McKnight
DIRECTOR, TALENT

John Levey
DIRECTOR, DRAMA DEVELOPMENT

Susan Horowitz
DIRECTOR, COMEDY DEVELOPMENT

Shelley Raskov
IRECTOR, CURRENT PROGRAMMING

Debbie Langford

NETWORK FEATURES, PAY TV & ANIMATION (WARNER BROS. CARTOONS, INC.)

75 Rockefeller Plaza, New York, NY 10019; (212) 484-8000.

PRESIDENT & PRESIDENT, WARNER BROS. ANIMATION Edward Bleie

VICE PRESIDENT, PAY TV SALES & ADMINISTRATION

Stanley Solson VICE PRESIDENT, MARKETING

Eric Frankel
DIRECTOR, FINANCIAL AFFAIRS

J. T. Shadoan

DIRECTOR, CLIENT SERVICES, PAY TV & NETWORK Margaret Jelcich

MANAGER, ADVERTISING, PUBLICITY & PROMOTION Barry Marx

MANAGER, PAY-TV MARKETING

Jeffrey Bernstein

WARNER BROS. ANIMATION, INC.

4000 Warner Blvd., Burbank, CA 91522; (818) 954-3713.

VICE PRESIDENT, GENERAL MANAGER

Jean MacCurdy VICE PRESIDENT, PRODUCTION & ADMINISTRATION Kathleen Helppie

WARNER BROS. DOMESTIC TELEVISION DISTRIBUTION

4000 Warner Blvd., Burbank, CA 91522; (818) 954-6000, Telex: 4720389.

PRESIDENT Dick Robertson

FIRST RUN DIVISION

SENIOR VICE PRESIDENT

Scott Carlin

Eastern Sales VICE PRESIDENT/MANAGER

Mark Robbins VICE PRESIDENT

Alicia Windroth
VICE PRESIDENT

Damian Riordan

Richard Cartier
DIRECTOR
Andrew Weir
DIRECTOR

Eric Strong ACCOUNT EXECUTIVE Jillian Lines

Western Sales

VICE PRESIDENT/MANAGER
Jeff Hufford

VICE PRESIDENT Mark O'Brien

DIRECTOR Ed Wasserman

DIRECTOR Jacqueline Hartley
DIRECTOR

William Hague

DIRECTOR

Mary Markarian

OFF-NETWORK DIVISION

SENIOR VICE PRESIDENT Keith Samples

New York

VICE PRESIDENT Rob Barnett

DIRECTOR

Mary Voli DIRECTOR

Scott Weber

Chicago VICE PRESIDENT

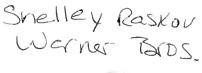
Steve Knowles
VICE PRESIDENT

John Louis DIRECTOR

Chris Smith

Los Angeles VICE PRESIDENT

Vince Messina





Case 6:23-cv-06025-FPG-MWP Document 15-1

Case #6:23-cv-06025-FPG-MWP

Markus Hopkins

Senior Counsel, Intellectual Property ViacomCBS Inc. 1515 Broadway New York, NY 10036 C: (626) 325-8389 Markus.Hopkins@cbs.com

July 13, 2021

Via Express Mail LeTicia Lee c/o SoRichlam Media P.O. Box 20711 Rochester, N.Y. 14602

RE: Girlfriends TV Show

Dear Ms. Lee,

I write on behalf of CBS Studios ("CBS") and Grammnet Productions ("Grammnet") in response to your letter dated June 11, 2021, addressed to Grammnet, making certain claims with respect to the television show GIRLFRIENDS (the "Series") produced by Grammnet and CBS. Based on the information you provided, there is no basis for your assertion that the Series constitutes copyright infringement of the work "Girlfriends," registered with the US Copyright Office as Reg. No. PAu001544414 as of August 8, 1991 (the "Synopsis"), and which lists you and Tracy Moore as co-authors. As explained below, any arguable similarities between the Series and the Synopsis are superficial at best. Your claim is without merit whether under a copyright or any other legal theory. In addition, your claim is time-barred under any theory.

We have not reviewed the Synopsis, and instead must rely on the brief statements in your letter and affidavit about its contents. Based on your description, any conceivable similarities between the Series and the Synopsis relate to general themes and ideas only. Even within your affidavit, your strongest assertion of infringement is that the Series is "loosely based" on the Synopsis and your "personal life and incidents." June 11, 2021 Affidavit of LeTicia Lee ("Lee Affidavit"), ¶ 24. Similarly, you also suggest that, in addition to the Series, other series such as LIVING SINGLE and FRIENDS are each based on your Synopsis, despite the vast and obvious differences between each of them (Lee Affidavit, ¶¶ 16-17). The primary concept these series all have in common is that the events of the series are based on the interactions of an ensemble cast of friends. At no point in your letter or affidavit do you provide examples of any expression that is protectable under copyright.

As you may be aware, copyright law does not protect general themes or ideas, but protects the specific manner in which ideas are expressed. "It is an axiom of copyright law that the protection granted to a copyrighted work extends only to the particular expression of the idea and never to the idea itself." Herzog v. Castle Rock Entertainment, 193 F.3d 1241, 1248 (11th Cir. 1999); Harper & Row Publishers, Inc. v. Nation Enters., 471 U.S. 539, 547 (1985) ("[N]o author may copyright facts or ideas."). Further, "[g]eneral plot ideas are not

CERTIFIED MAIL® RECEIPT Domestic Mail Only Ŋ m For delivery information, visit our website at www Santa Monica, CA 9040 Γ Certified Mail Fee #3.60 ш _ Extra Services & Fees (check box, add as appropries Return Receipt (hardscpy) \$0.00 Return Receipt (e estrario: Postmark Certified Mail Restricted Delivery \$Ŭ.ŬŨ Here Agult Signature Required **\$0.00** Adult Signature Pestricted Delivery 7640 ostage \$1.20 Total Postage and Fees 44/2021 Clournment No., or PO Box No. 61 SANTA1 471 CC. 5/1 50400 SANTA MYMON, GA

























JACOMCBS

EX I. 2nd 103/85

Case #6:23-cv-06025-FPG-MWP

protected by copyright law; they remain forever the common property of artistic mankind." *Berkic v. Crichton*, 761 F.2d 1289, 1293 (9th Cir. 1985). Therefore, courts "must decide if the similarities between the works involve similar expressions of ideas, as opposed to the mere articulation of similar general themes." *Beal v. Paramount Pictures*. 806 F. Supp. 963 (N.D. Ga 1992), *aff'd*, 20 F.3d 454 (11th Cir. 1994). Any common elements of the Synopsis and the Series are generic ideas, and the expressions of these ideas in each work appear to be remarkably and extensively different.

While we can appreciate your pride of authorship in the Synopsis and your desire to ensure that it is protected, based on the contents of your letter and affidavit, there is no basis on which to conclude that the Series infringes the Synopsis.

In addition to addressing the substance of your infringement claim, your demand for compensation for "over twenty years" of alleged infringement is time-barred because the statute of limitations for copyright infringement is three years. 17 U.S. Code § 507(b). Production of the Series also ended over 12 years ago, so by this measure your allegations still come too late. The Copyright Act imposes its three-year limit on claims so that those accused of infringement may be able to rely on a potential claimant's failure to file suit as acquiescence to their conduct, and so that courts do not become overburdened with stale claims.

This response is not intended as a point-by-point discussion of the contents of your letter and affidavit, but only a general refutation of the spurious assertions contained therein, as well as the overall validity and timeliness of your claims. Nothing herein shall be deemed a waiver of any rights, remedies or defenses of CBS and/or Grammnet, all of which are expressly reserved.

Best

Markus Hopkins















plutoe











Case 6:23-cv-06025-FPG-MWP Document 15-1 d Filed 04/04/23 Page 67 of 196

Viceon/GS as per estorney letter.

USPS Tracking®

FAQs >

Track Another Package +

Case #6:23-cv-06025-FPG-ANALO

Tracking Number: 70191640000004272355

Remove X

The delivery status of your item has not been updated as of June 24, 2021, 1:41 am. We apologize that it may arrive later than expected.

Awaiting Delivery Scan

June 24, 2021 at 1:41 am

Get Updates 🗸

Lland Garens

Feedback

Text & Email Updates	~
Tracking History	~
Product Information	~

See Less ∧

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23 Page 68 of 96

Case #6:23-cv-06025-FPG-MWP



21st Floor 1251 Avenue of the Americas New York, NY 10020-1104

Elizabeth McNamara 212.603.6437 tel lizmcnamara@dwt.com

February 8, 2022

Via U.S. Mail

LeTicia Lee c/o SoRichIam Media P.O. Box #20711 1335 Jefferson Rd. Rochester, New York 14602

Re: LeTicia Lee dba SoRichIAm Media v. Warner Media LLC et al., No. 2021-3189 (Supreme Court of the State of New York – County of Monroe)

Dear Ms. Lee:

We represent WarnerMedia, LLC, Warner Bros. Television Studios, HBO, ViacomCBS Inc., Grammnet Productions, Comcast Corporation, and NBCUniversal Media, LLC (the "Parties"). It was brought to the Parties' attention that you have apparently filed a lawsuit against them, alleging that the television series "Friends," "Sex and the City," "Living Single," "Girlfriends," and "And Just Like That," as well as the films "Sex and the City" and "Sex and the City 2" (the "Works") infringe on your treatment and pilot script for a sitcom entitled "Girlfriends." I am writing to inform you that, as detailed below, this action suffers from multiple infirmities and is entirely without merit. Among other serious issues, you assert what purport to be copyright claims, but you have filed the action in a New York state court, when federal courts have exclusive jurisdiction over Copyright Act claims. And even if you could overcome this jurisdictional issue and the substantive roadblocks to your claims, you have not properly served any of the Parties and have therefore not commenced the action. For these reasons, we hope and expect that you will withdraw this case.

First, as noted, you have not properly served the lawsuit on any of the Parties. Service of a corporation via certified mail does not satisfy New York's rules of service under the Civil Practice Law and Rules ("CPLR") § 311, absent a Court order permitting otherwise (which to our knowledge you have not obtained). And to the extent you were attempting service by mail under CPLR § 312-a, you did not transmit to the Parties two copies of a statement of service by mail and acknowledgment of receipt as required by that statutory provision. Finally, to date, you have not filed an affidavit regarding proof of service with the Court pursuant to CPLR § 306. For all these reasons, you have not properly served any of the Parties as you are required to do under New York law.

DWT.COM

Case #6:23-cv-06025-FPG-MWP

February 8, 2022 Page 2

Second, to the extent that your claims are based on alleged violations of the U.S. Copyright Act, a New York state court cannot properly hear those claims. Instead, federal courts have exclusive jurisdiction over actions arising under the Copyright Act. See 28 U.S.C. § 1338 (2000); Jasper v. Bovina Music, Inc., 314 F.3d 42, 46 (2d Cir. 2002); Pollicina v. Misericordia Hosp. Med. Ctr., 82 N.Y.2d 332, 339 n.3 (1993) ("[New York courts] cannot entertain cases in which exclusive jurisdiction has been conferred by Congress on the Federal courts," including copyright infringement suits). For this reason, your lawsuit filed in New York state court is jurisdictionally improper.

Third, your claims substantively have no merit. You appear to allege copyright infringement based merely on superficial similarities between your treatment/pilot script and the Works. All of these claims appear to arise out of actions that occurred over 30 years ago and would be largely time-barred given the extensive passage of time. Further, the Works share nothing more with your treatment/pilot script than the broad concept of a comedic ensemble of friends and various highly general commonalities between a few characters. It is wellestablished that such "general ideas" are "unprotectible" under copyright law. Abdin v. CBS Broad. Inc., 971 F.3d 57, 73 (2d Cir. 2020); see also Gund, Inc. v. Smile Int'l, Inc., 691 F. Supp. 642, 645 (E.D.N.Y. 1988), aff'd sub nom. Gund, Inc. v. Smile Intl Inc., 872 F.2d 1021 (2d Cir. 1989) ("[T]o the degree that the similarity between a copyrighted work and an alleged infringing work inheres only in the general ideas expressed, the similarities are not infringing."). Each of the challenged Works is as independently distinct from the other Works as they are readily distinguishable from your treatment/pilot script. Accordingly, your claims have no support in copyright or related law, and there is no basis on which to conclude that the Works infringe your treatment/pilot script.

In sum, because you have not properly served any of the Parties, and none of the Parties have appeared in the action, the Parties do not plan to respond further at this time. Moreover, given that your claims are not proper before a New York court and are entirely meritless, we hope and expect that you withdraw the action that you have apparently filed against the Parties.

This letter does not purport to constitute a complete list of the Parties' rights, contentions, defenses, or legal theories and nothing recited here is intended as, nor should it be deemed to constitute, a waiver or relinquishment of any of the Parties' rights or remedies, whether legal or equitable, all of which are expressly reserved.

Sincerely,

Elizabeth McNamara

Davis Wright Tremaine LLP

Elizon A.M.

Case #6:23-cv-06025-FPG-MWP





1251 Avenue of the Americas, 21st Floor New York, NY 10020-1104



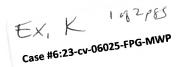
Rochester, New York 14602 c/o SoRichlam Media 1335 Jefferson Rd. P.O. Box #20711 LeTicia Lee

1200

Page 1 of 2

Monroe County Clerks Office Case Docket

Report Date and Time: 07/05/2022 10:48 AM



Case Number: I2021003189

Party 1:

LEE LETICIA

Party 2: CBS COMCAST GRAMMNET PRODUCTIONS HBO NBC UNIVERSAL TELEVISION VIACOM WARNER BROS TELEVISION WARNER MEDIA LLC

Party 3: Attorney: PRO SE

Documents:

Documents.		
Date	Instrument Number	Instrument Type
	Unrecorded #8839019	AMENDED NOTICE OF MOTION
	Unrecorded #8839028	AMENDED NOTICE OF MOTION
	Unrecorded #8839238	AMENDED NOTICE OF MOTION
2021-08-11 16:06:09.0	202108111090	INDEX NUMBER APPLICATION
2021-12-30 16:42:16.0	202112300893	RJI (REQUEST FOR JUDICIAL INTERVENTION)
2021-12-30 16:42:17.0	202112300894	NOTICE OF MOTION OR CROSS MOTION
2022-02-15 13:07:43.0	202202150706	NOTICE OF MOTION OR CROSS MOTION
2022-02-15 14:34:37.0	202202250813	AMENDED NOTICE OF MOTION
2022-06-01 15:24:02.0	202206011211	AMENDED NOTICE OF CROSS MOTION

Docket:

Entry	
08/11/2021 CIVIL, SUMMONS	
02/04/2022 ORDER TO SHOW CAUSE(1/27/22)	
02/15/2022 AFF OF SVC ON WARNER MEDIA/HBO, AFF OF SVC ON WARENER BROTHERS TELEVISION GROUP, AFF OF SVC ON GRAMMNET PRODS, AFF OF SVC ON VIACOM/CBS	
03/03/2022 MOTION FOR DEFAULT JUDGMENT, AFFIDAVIT OF SERV, AFFIDAVIT OF CLAIMS AND SUMMONS, SUPPORTING STATEMENTS,	
03/08/2022 ORDER(3/8/22)	
03/09/2022 ORDER(3/8/22)	
03/18/2022 AMENDED AFFIDAVIT	
03/22/2022 AMENDED AFFIDAVIT OF SERV	
03/22/2022 AMENDED AFFIDAVIT OF CLAIMS	
04/28/2022 AMENDED SUMMONS	
05/24/2022 AFFIDAVIT OF SERV	

Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23 Page 72 of 96

Page 2 of 2

Monroe County Clerks Office Case Docket

Case #6:23-cv-06025-FPG-MWP

Report Date and Time: 07/05/2022 10:48 AM

06/10/2022

06/10/2022|PROOF OF DELIVERY, MOTION FOR DEFAULT JUDGEMENT

Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23 Page 73 of 96

of 96

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF MONROE

Ex, K, P8/02 2

LETICIA LEE dba SORICHIAM MEDIA, Plaintiff,

VS.

ORDER

Index #I2022002428

WARNER MEDIA LLC; HBO HOME ENTERTAINMENT, INC.; WARNER BROS. WORLDWIDE TELEVISION DISTRIBUTION, INC.; NBC UNIVERSAL TELEVISION STUDIO DIGITAL DEVELOPMENT LLC; CBS BROADCASTING INC.; GRAMNET NH PRODUCTIONS,

Plaintiff having moved for an order granting permission to proceed as a poor person pursuant to CPLR § 1101 by way of Notice of Motion sworn to on August 24, 2022 and this Court having considered same, it is hereby

ORDERED that Plaintiff's motion for an order granting permission to proceed as a poor person is stayed pending the Plaintiff's submission to the Court a certificate of an attorney stating that the attorney has examined the action and believes there is merit to the moving party's contentions pursuant to CPLR § 1101(b); and it is further

Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23 Page 74 of 96

Ex K, 202 K1

ORDERED that such certificate shall be filed by the Plaintiff by November 21, 2022; and it is further

ORDERED that Plaintiff's motion for an order granting permission to proceed as a poor person shall be considered on November 22, 2022, on submissions only.

Dated:

September <u>22</u>, 2022

Ionorable Daniel J. Doyle

Supreme Court Justice

STATE OF NEW YORK
SUPREME COURT COUNTY OF ONTARIO

Ex. L 10f 7/gs

Case #6:23-cv-06025-FPG-MWP

7185.

Leticia Lee

MOTION FOR POOR PERSON DECISION AND ORDER

-against-

Index No. 134539-2022

Warner Media LLC; Warner Bros Worl Distribution Inc.; NBC Universal Televis Development Inc.; CBS Broadcasting Inc Productions; HBO Home Entertai

The Court having reviewed the submitted documents, Notice of Motion and Affidavit in Support of Application to Proceed as a Poor Person of the Plaintiff, {PLAINTIFF NAME}, residing at {PLAINTIFF ADDRESS 1}, {PLAINTIFF CITY}, {PLAINTIFF STATE} {PLAINTIFF ZIP}, which were filed at the Office of the County Clerk on 11/09/2022, and based on the merits presented, and the County Attorney having no objection to this motion, it is hereby **ORDERED**: That the plaintiff's motion to Proceed as a Poor Person, waiving all fees and costs relating to the filing and service, is hereby GRANTED. It is further ORDERED, pursuant to CPLR §1103, that any recovery by judgment or by settlement had in favor of the plaintiff, shall be paid to the clerk of the court in which the order permitting the person to proceed as a poor person was entered, to await distribution pursuant to the court. That the plaintiff's motion to Proceed as a Poor Person, waiving all fees and costs relating to the filing and service, is hereby DENIED. It is further ORDERED, pursuant to CPLR §1101(d) that this case will be DISMISSED if the fee is NOT PAID WITHIN ONE HUNDRED TWENTY (120) DAYS of the date of this order. That pursuant to CPLR §306-b the Petitioner's time to serve process is extended by 120 days from the date of this order. Dated this 28 day of 100. 2018.

Honorable Graig

ONTARIO COUNTY CLERK'S OFFICE FILED

DEC 0 2/2022

MATTHEW J. HOOSE, County Clerk By_____

REQUEST FOR JUDICIAL INTERVENTION

UCS-840 (rev. 07/29/2019)

SUPPLEME COURT, COUNTY OF ONTARIO Index No: 134539-2020 Date Index Issued: For Court Use Only: Enter the complete case caption. Do not use et al or et ano. If more space is needed, attach a caption rider sheet. IAS Entry Date LETICIA LEE Plaintiff(s)/Petitioner(s) Judge Assigned -against-WARNER MEDIA LLC; HBO HOME ENTERTAINMENT, INC.; WARNER BROS. WORLDWIDE TELEVISION DISTRIBUTION, INC.; NBC UNIVERSAL TELEVISION STUDIO DIGITAL DEVELOPMENT RJI Filed Date LLC; CBS BROADCASTING INC.; GRAMMNET NH PRODUCTIONS Defendant(s)/Respondent(s) NATURE OF ACTION OR PROCEEDING Check only one box and specify where indicated. MATRIMONIAL COMMERICIAL O Business Entity (includes corporations, partnerships, LLCs, LLPs, etc.) Contested NOTE: If there are children under the age of 18, complete and attach the O Contract MATRIMONIAL RJI ADDENDUM (UCS-840M). O Insurance (where insurance company is a party, except arbitration) For Uncontested Matrimonial actions, use the Uncontested Divorce RJI (UD-13). O UCC (includes sales and negotiable instruments) O Other Commercial (specify):_ TORTS NOTE: For Commercial Division assignment requests pursuant to 22 NYCRR 202.70(d), Asbestos O Child Victims Act complete and attach the COMMERCIAL DIVISION RJI ADDENDUM (UCS-840C). Specify how many properties the application includes: O Environmental (specify): __ O Condemnation Medical, Dental or Podiatric Malpractice O Motor Vehicle O Mortgage Foreclosure (specify): O Residential O Commercial O Products Liability (specify): _ Property Address: __ O Other Negligence (specify): NOTE: For Mortgage Foreclosure actions involving a one to four-family, Other Professional Malpractice (specify): _____ owner-occupied residential property or owner-occupied condominium, Other Tort (specify): complete and attach the FORECLOSURE RJI ADDENDUM (UCS-840F). SPECIAL PROCEEDINGS O Tax Certiorari CPLR Article 75 (Arbitration) [see NOTE in COMMERCIAL section] O Tax Foreclosure 0 O CPLR Article 78 (Body or Officer) Other Real Property (specify): O Election Law OTHER MATTERS 0 [see NOTE in COMMERCIAL section] Extreme Risk Protection Order Certificate of Incorporation/Dissolution O MHL Article 9.60 (Kendra's Law) 0 Emergency Medical Treatment 0 MHL Article 10 (Sex Offender Confinement-Initial) Habeas Corpus O MHL Article 10 (Sex Offender Confinement-Review) UNITY CLERK'S OFFICE Local Court Appeal 0 MHL Article 81 (Guardianship) Mechanic's Lien \circ 0 Other Mental Hygiene (specify): Name Change \circ O Other Special Proceeding (specify): ___ Pistol Permit Revocation Hearing O Sale or Finance of Religious/Not-for-Profit Property Other (specify): MATTHEW J. HOOSE County Cler STATUS OF ACTION OR PROCEEDING

Answer YES or NO for every question and enter additional information where indicated. YES NO ◉ ◉ If yes, date filed: Has a summons and complaint or summons with notice been filed? Has a summons and complaint or summons with notice been served? • ◉ If yes, date served: Is this action/proceeding being filed post-judgment? 0 ◉ If yes, judgment date: _ NATURE OF JUDICIAL INTERVENTION Check one box only and enter additional information where indicated. Infant's Compromise O Extreme Risk Protection Order Application Note of Issue/Certificate of Readiness O Notice of Medical, Dental or Podiatric Malpractice Date Issue Joined: O Notice of Motion Relief Requested: O Notice of Petition Relief Requested: Return Date: Order to Show Cause Relief Requested: Return Date: Other Ex Parte Application Relief Requested: Poor Person Application Request for Preliminary Conference \circ Residential Mortgage Foreclosure Settlement Conference Ю Writ of Habeas Corpus

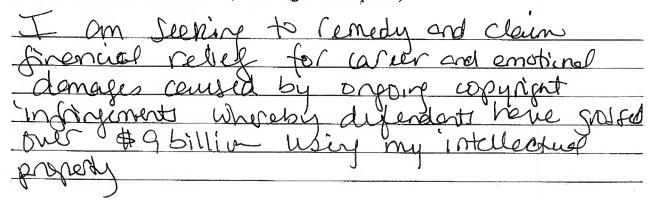
Other (specify): Request tv studios compensate for itemized claims and damages thereof

Plaintiff, Petitioner, R MEDIA LLC (HBO HOME ENTERTAINMENT, ARNER BROS. WORLDWIDE TELEVISION BUTION, INC); NBC UNIVERSAL TELEVISION POLICITAL DEVELOPMENT LLC: CBS RESPONDENT, RESPONDENT, Respondent,	Index No. 134539 72027 Affidavit in Support of Application to Proceed as a
Petitioner, - against - R MEDIA LLC (HBO HOME ENTERTAINMENT, ARNER BROS. WORLDWIDE TELEVISION BUTION, INC); NBC UNIVERSAL TELEVISION Defendant, Defendant, Defendant, Defendant,	Application to Proceed as a
R MEDIA LLC (HBO HOME ENTERTAINMENT, ARNER BROS. WORLDWIDE TELEVISION BUTION, INC); NBC UNIVERSAL TELEVISION Defendant, Bution, Inc); NBC UNIVERSAL TELEVISION	
DIGITAL DEVELOPMENT LLC; CBS CASTING INC.; GRAMMNET NH PRODUCTIONS STATE OF NEW YORK) COUNTY OF BEEN SS:	Poor Person
The undersigned, being duly sworn, says:	
1. I am the plaintiff / defendant in this case. I submit this affid	avit in support of my request,
(a) for waiver of the index number fee and / or any filing	ng and service fee and costs, and
(b) to proceed in this case as a poor person.	
2. I support myself and others in my household.	
	ONTARIO COUNTY CLERK'S OFFICE FILED
3. My only source of income is (check one):	NOV 0 9 2022
[] Public Assistance [] Social Security / SSI	MATTHEW J. HOOSE, County Clerk By
Mother Living it family member	ACTING DEPUTY CLERK
4. The amount of income I receive each month is \$	
5. Check one of the items below:	
[] I do not have a bank account I have a bank account with approximately \$	in the account.
6. I own the following property which has an estimated value <u>List Property</u>	as indicated:(If none, write "None") <u>Value</u>
List Property ASVE AONE NONE	

(Signature)

- 7. I have no other savings, property or assets.
- 8. I am unable to pay the costs, fees and expenses necessary to assert my rights in this case.
- 9. No one else who is able to pay any required costs and fees has a beneficial interest in the results of this case.
- 10. Briefly stated, the facts of my case are as follows:

(For example, if seeking a divorce on grounds of abandonment, briefly state the circumstances of the abandonment, including date and place.)



- 11. A copy of my proposed summons and verified complaint or other court pleadings are attached.
- 12. I have made no prior request for this relief in this case.

Wherefore, I request (a) that all fees relating to the filing and service of this action / proceeding be waived, and (b) that I be permitted to proceed in this case in all respects as a poor person.

Dated

Sworn to before me this

19 CMSV

_day of

Notary Public / Court Clerk

STACI LEONARD

Notary Public, State of New York

Qualified in Ontario County

Commission Expires January 23, 20

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF ONTARIO	Index No.: 134539-2022
LETICIA LEE,	X
Plaintiff, Addend	
Poor Pe	rson Application CPLR 1101
VS.	
WARNER MEDIA LLC (HBO HOME ENTERTAINMENT	, INC.; WARNER BROS.

Defendants,

I, Pro Se Plaintiff (*not an attorney*), also submit **proof of ownership** (**Exhibit A & B**) of Intellectual Property entitled: GIRLFRIENDS © 1991 (copyright registration documents went beyond a concept and included a detailed show Treatment, Outline of 1st Season, Character List, and a Pilot Script).

WORLDWIDE TELEVISION DISTRIBUTION, INC.); NBC UNIVERSAL TELEVISION STUDIO DIGITAL DEVELOPMENT LLC; CBS BROADCASTING INC.; GRAMMNET NH

Rest assured, my summons and complaint are not frivolous but authentic, genuine, and true as I seek to collect for career and emotional damages caused by continuous copyright infringements by the Defendants who have grossed over nine billion U.S. dollars over thirty plus years using my Works and Contributions for which I was never credited or compensated.

This has deeply impacted my career, financial, emotional and quality of life. Thank you in advance for the opportunity to have due process and recover all with God's help.

Kind Regards,

PRODUCTIONS

1335 Jefferson Ave #20711

Rochester, New York 14602 USA

ONTARIO COUNTY CLERK'S OFFICE
• FILED

NOV 1 6 2022

MATTHEW J. HOOSE, County Clerk

ACTING DEPUTY CLERK

State of New York County of Ontario

Sween to (or affirmed) before me on

Signature of Notary Public

Notary Public

SHEILA M. CZADZECK
Notary Public, State of New York
Ontario County Reg. #04CZ6095959
Commision Expires 07/21/

ATIFIC	Case 6:23-cv-06025 ATE OF COPYRIGH	5-FPG-MWP Document 15-1 File	ed 04/04/33, Page 80 of 96 UNITED STATES COPYRIGHT OFFICE
ATIFIC ONLIND THE LA	This certificat Office in acco of title 17, Un istration has b	e, issued under rdance with the provisions of 5-6025-FPG-MWP ited States Code, attests that copyright reg-	REGISTRATION NUMBER
NA * TH	information in Copyright Off	this certificate has been made a part of the crecords.	PA PAU EFFECTIVE DATE OF REGISTRATION
LIBRARY	OF CONCR	Topland	AUG 19 1991
OFFICIA.	AL SEAL	REGISTER OF COPYRIGHTS United States of America	
	TITLE OF THIS WORK ▼	INE. IF YOU NEED MORE SPACE, USE A SEPAR	ATE CONTINUATION SHEET.
	PREVIOUS OR ALTERNATIVE	CIEVIDS ETITLES V	
	NATURE OF THE WAY		
	NATURE OF THIS WORK V		sion - Syndisis of Fais.
2	NAME OF AUTHOR	Lee	DATES OF BIRTH AND DEATH Year Born ▼ Year Died ▼ 1967
NOTE	Was this contribution to the work a "work made for hire"? Yes No NATURE OF AUTHORSHIP	AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR { Citizen of Domiciled in Briefly describe nature of the material created by this auth	WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Tes No Pseudonymous? Yes No
Hodor the Isa		encept for a situation	DATES OF BIRTH AND DEATH
2 + 0	Vace	Moure	Year Born ▼ Year Died ▼
2386 52386	Was this contribution to the work a Yes "work made for hire"?	AUTHOR'S NATIONALITY OR DOMICILE Name of country OR Citizen of Domiciled in	WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Tes X No.
	NATURE OF AUTHORSHIP	Briefly describe nature of the material created by this auth	
-	NAME OF AUTHOR ▼		DATES OF BIRTH AND DEATH Year Born ▼ Year thest ▼
	Was this contribution to the work a □ Yes "work made for hire"? □ No	AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR { Citizen of ▶ Domiciled in ▶	WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Yes No 1986
	NATURE OF AUTHORSHIP	Briefly describe nature of the material created by this authorized	or in which copyright is claimed. ▼
			PUBLICATION OF THIS PARTICULAR WORK Oa, ▶
4	same as the author given in space 2.	ame and address must be given even if the claimant is the	W Alife to to a
See instructions before completing this space	Tracing Moore 149	DEKALB ALL BROOKLYN, UY 11217	TWO DEPOSITS RECEIVED
ins space	TRANSFER If the claimant(s) nam in space 2, give a brief statement of	ed here in space 4 are different from the author(s) named now the claimant(s) obtained ownership of the copyright.	FEMITTANCE NUMBER AND DATE
***************************************	MORE ON BACK ▶ • Complete	all applicable spaces (numbers 5-9) on the reverse side of this page ed instructions • Sign the form at line 8	DO NOT WRITE HERE

P., Dages

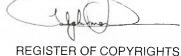
Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23 7 Page 81 of 96

ATIFICATE OF COPYRIGHT REGISTRATION



OFFICIAL SEAL

This certificate, issued under the seal of the Copyright Office in accordance with the provisions of section 410(a) of title 17, United States Code, attests that copyright registration has been made for the work identified below. The information in this certificate has been made a part of the Copyright Office records.



United States of America

Case #6:23-cv-06025-FPG-MWP FUKM PA

UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER Xhibit

PAu 1 594 108

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET. TITLE OF THIS WORK V PREVIOUS OR ALTERNATIVE TITLES NATURE OF THIS WORK ▼ See instructions (pilot for television) NAME OF AUTHOR ▼ DATES OF BIRTH AND DEATH Year Born ▼ Year Died ¶ 20 2/2/67

IOTE	Was this contribution to the work a "work made for hire"? Yes No No NATURE OF AUTHORSHIP Briefly describe nature of the material created by this authors.	WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Yes No of these questions result of these questions of these questions are in which copyright is claimed. ▼
122T9h0	Was this contribution to the work a ———————————————————————————————————	DATES OF BIRTH AND DEATH Year Born V 3/30/62 WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anogymous? Yes X No of these questions
	NATURE OF AUTHORSHIP NAME OF AUTHOR OR Domiciled in Domiciled in NAME OF AUTHORSHIP NAME OF AUTHOR NAME OF AUTHOR	Pseudonymous Yes No 'Yes' see getalled instructions r in which copyright is claimed ▼
	Was this contribution to the work a AUTHOR'S NATIONALITY OR DOMICILE	DATES OF BIRTH AND DEATH Year Born ▼ Year Died ▼ WAS THIS AUTHOR'S CONTRIBUTION TO
J Uddill brain	Yes "work made for hire"? Name of Country OR { Citizen of ▶ Domiciled in ▶	THE WORK Anonymous? Yes No if the answer to either of these questions is Yes is each detailed. Pseudonymous? Yes No instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

***	YEAR IN WHICH CREAT	ION OF THIS
***	WORK WAS COMPLETE	
		must be given in all cases.

Complete this information Month ONLY if this work has been published.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

DEC. 19.1991 ONE DEPOSIT RECEIVED

OF 19191

TWO DEPOSITS RECEIVED REMITTANCE NUMBER AND DATE

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.▼

See instructions refore completing

ta. 4 192885

Case #6:23-cv-06025-FPG-MWP

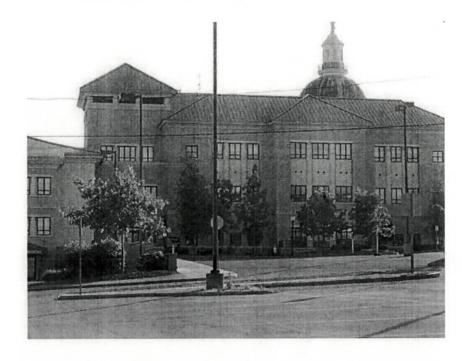


Ontario County clerk dies; had been recent subject of a 'no confidence' vote by Board of Supervisors

WXXI News | By Randy Gorbman

Published February 21, 2023 at 4:50 PM EST





Ontario County /

Ontario County Municipal Building in Canandaigua, NY.

Ontario County Clerk Matthew Hoose, who had been criticized by county officials



WXXI AM News

Here and Now

Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23, Page 83 of 96

Ontario County clerk dies; had been recent subject of a 'no confidence' v

me sheriff's department also put out a statement saying that they responded to an unattended death at a residence in the town of Canandaigua, and while they say the cause of death of the 54-year-old Hoose remains under investigation, it does not appear to be suspicious.

County officials also said they will have no further comment at this time and said that their thoughts and prayers are with the entire family of Hoose.

Last Friday, the Ontario County Board of Supervisors passed a resolution of "no confidence" in the county clerk, saying that in June of last year, county leaders were notified the clerk was significantly behind in remitting required reports and payments to various New York state entities.

The county statement had also said Hoose had consistently refused to report to the relevant oversight committees of the Board of Supervisors.

Hoose had been Ontario County clerk since 2012.

Officials announced that in the wake of Hoose's death, the Ontario County Department of Motor Vehicles will be closed to in-person transactions through Thursday, Feb. 23.

Residents are still able to drop off registration transactions in the dropbox located at the Department of Motor Vehicle entrance for processing, but all other transactions will need to wait until the office reopens on Friday.

Local News





Randy Gorbman

Randy Gorbman is WXXI's director of news and public affairs. Randy manages the day-to-day operations of WXXI News on radio, television, and online.

See stories by Randy Gorbman

WXXI AM News
Here and Now

Ontario County Clerk Matthew J. Hoose

20 Ontario Street Canandaigua, NY 14424 (585) 396-4200 Ex M | Of 10 PS;

Case #6:23-cv-06025-FPG-MWP



Date: 11/09/2022 04:17:53 PM

Received From: LETICIA LEE

Receipt #: 642207 Index #: 134539-2022

Order Type: File Civil Action Documents

Receipted By: SL

INDEX NUMBER APPLICATION	\$0.00
SUMMONS AND COMPLAINT	\$0.00
CIVIL ACTION DOC	\$0.00
RJI	\$0.00
Total Charges:	\$0.00
Payments Received:	

\$0.00

Change

Printed: 11/09/2022 04 19 12 PM

SUPREME COURT OF THE STATE OF NEW YORK COUNTY ONTARIO

Index No.: 134539-2022

-----)

LETICIA LEE,

Plaintiff,

VS.

AFFIDAVIT OF SERVICE

WARNER MEDIA LLC (HBO HOME ENTERTAINMENT, INC.; WARNER BROS.WORLDWIDE TELEVISION DISTRIBUTION, INC.); NBC UNIVERSAL TELEVISION STUDIO DIGITAL DEVELOPMENT LLC; CBS BROADCASTING INC.; GRAMMNET NH PRODUCTIONS.

Defendants.

-----X

State of New York, County of Kings, ss.:

Juan de los Santos, being duly sworn, deposes and says:

I am over 18 years of age and I am not a party to this action. I am a duly licensed New York City process server authorized to serve process with license number 2067123.

On December 13, 2022 at 11:51 a.m., at 28 Liberty Street, 42nd Floor, New York, New York 10005, I personally served the within AMENDED SUMMONS AND COMPLAINT, in this matter, on **WARNER MEDIA LLC**, Defendant, by delivering true copies of said AMENDED SUMMONS AND COMPLAINT to OSMARA MARTINEZ, Intake Specialist of CT Corporation System, who indicated that she was expressly authorized to accept process on behalf of said Defendant. CT Corporation System is said Defendant's registered agent for service of process.

Description of the Individual Served on Behalf of the Defendant:

Sex: Female

Color of skin: White

Color of hair: Black

Approx. age: 28-38 Years

Approx. weight: 120-135 LB. Approximate height: 5' 05"-5' 07"

Other id. features: None

Juan de los Santos

New York Process Server No. 2067123

Sworn to before me, on this 14th day of December, 2022

ONTARIO COUNTY CLERK'S OFFICE FILED

Juan de los Santos
New York Process Server # 2067123
E 54 Bristol Street, Ste. 7F
Brooklyn, NY 11212

Notary Public, State of New York

MELISSA CRUZ NOTARY PUBLIC-STATE OF NEW YORK No 01CR6115265

No 01CR6115265 Qualified in Kings County My Commission Expires 09-07-2024 JAN 1 1 2023
MATTHEW J. HOOSE, County Clerk

SUPREME COURT OF THE STATE OF NEW YORK **COUNTY ONTARIO**

Index No.: 134539-2022

LETICIA LEE,

Plaintiff,

VS.

AFFIDAVIT OF SERVICE

WARNER MEDIA LLC (HBO HOME ENTERTAINMENT, INC.: WARNER BROS. WORLDWIDE TELEVISION DISTRIBUTION, INC.); NBC UNIVERSAL TELEVISION STUDIO DIGITAL DEVELOPMENT LLC; CBS BROADCASTING INC.; GRAMMNET NH PRODUCTIONS.

Defendants.

State of New York, County of Kings, ss.:

Juan de los Santos, being duly sworn, deposes and says:

I am over 18 years of age and I am not a party to this action. I am a duly licensed New York City process server authorized to serve process with license number 2067123.

On December 13, 2022 at 11:51 a.m., at 28 Liberty Street, 42nd Floor, New York, New York 10005, I personally served the within AMENDED SUMMONS AND COMPLAINT, in this matter, on WARNER BROS. WORLDWIDE TELEVISION DISTRIBUTION INC., Defendant, by delivering true copies of said AMENDED SUMMONS AND COMPLAINT to OSMARA MARTINEZ, Intake Specialist of CT Corporation System, who indicated that she was expressly authorized to accept process on behalf of said Defendant. CT Corporation System is said Defendant's registered agent for service of process.

Description of the Individual Served on Behalf of the Defendant:

Sex: Female

Color of skin: White

Color of hair: Black

Approx. age: 28-38 Years Other id. features: None

Approx. weight: 120-135 LB.

Approximate height: 5' 05"-5' 07"

Juan de los Santos New York Process Server No. 2067123

> Juan de los Santos New York Process Server # 2067123

Sworn to before me, on this 14th day of December, 2022

Melissa Cruz,

Notary Public, State of New York

MELISSA CRUZ

NOTARY PUBLIC-STATE OF NEW YORK No 01CR6115265 Qualified in Kings County

My Commission Expires 09-07-2024

FILED

ONTARIO COUNTY CLERK'S OFFICE OKION, NY 11212

A of Ms.

Case #6:23-cv-06025-FPG-MWP

SUPREME COURT OF THE STATE OF NEW YORK **COUNTY ONTARIO**

Index No.: 134539-2022

LETICIA LEE,

Plaintiff.

VS.

AFFIDAVIT OF SERVICE

WARNER MEDIA LLC (HBO HOME ENTERTAINMENT, INC.; WARNER BROS. WORLDWIDE TELEVISION DISTRIBUTION, INC.); NBC UNIVERSAL TELEVISION STUDIO DIGITAL DEVELOPMENT LLC; CBS BROADCASTING INC.; GRAMMNET NH PRODUCTIONS.

Defendants.

State of New York. County of Kings, ss.:

Juan de los Santos, being duly sworn, deposes and says:

I am over 18 years of age and I am not a party to this action. I am a duly licensed New York City process server authorized to serve process with license number 2067123.

On December 13, 2022 at 11:51 a.m., at 28 Liberty Street, 42nd Floor, New York, New York 10005, I personally served the within AMENDED SUMMONS AND COMPLAINT, in this matter, on HBO HOME ENTERTAINMENT, INC., Defendant, by delivering true copies of said AMENDED SUMMONS AND COMPLAINT to OSMARA MARTINEZ, Intake Specialist of CT Corporation System, who indicated that she was expressly authorized to accept process on behalf of said Defendant. CT Corporation System is said Defendant's registered agent for service of process.

Description of the Individual Served on Behalf of the Defendant:

Sex: Female

Color of skin: White

Color of hair: Black

Approx. age: 28-38 Years

Approx. weight: 120-135 LB.

Approximate height: 5' 05"-5' 07"

Other id. features: None

Sworn to before me, on this

Juan de los Santos

ONTARIO COUNTY CLERK'S OFFIGEOOKIYN, NY 11212

New York Process Server No. 2067123

Juan de los Santos New York Process Server # 2067123 54 Bristol Street, Ste. 7F

14th day of December, 2022

Melissa Cruz

Notary Public, State of New York

MELISSA CRUZ

NOTARY PUBLIC-STATE OF NEW YORK No 01CR6115265 Qualified in Kings County My Commission Expires 09-07-2024

JAN 1 1 2023

FILED

MATTHEW J. HOOSE, County Clerk

5 of 10 pgs

Case #6:23-cv-06025-FPG-MWP

SUPREME COURT OF THE STATE OF NEW YORK **COUNTY ONTARIO**

Index No.: 134539-2022

LETICIA LEE,

Plaintiff,

VS.

AFFIDAVIT OF SERVICE

WARNER MEDIA LLC (HBO HOME ENTERTAINMENT, INC.; WARNER BROS. WORLDWIDE TELEVISION DISTRIBUTION, INC.); NBC UNIVERSAL TELEVISION STUDIO DIGITAL DEVELOPMENT LLC; CBS BROADCASTING INC.; GRAMMNET NH PRODUCTIONS.

Defendants.

State of New York. County of Kings, ss.:

Juan de los Santos, being duly sworn, deposes and says:

I am over 18 years of age and I am not a party to this action. I am a duly licensed New York City process server authorized to serve process with license number 2067123.

On December 13, 2022 at 11:51 a.m., at 28 Liberty Street, 42nd Floor, New York, New York 10005, I personally served the within AMENDED SUMMONS AND COMPLAINT, in this matter, on NBC UNIVERSAL TELEVISION STUDIO DIGITAL DEVELOPMENT LLC, Defendant, by delivering true copies of said AMENDED SUMMONS AND COMPLAINT to OSMARA MARTINEZ, Intake Specialist of CT Corporation System, who indicated that she was expressly authorized to accept process on behalf of said Defendant. CT Corporation System is said Defendant's registered agent for service of process.

Description of the Individual Served on Behalf of the Defendant:

Sex: Female Approx. weight: 120-135 LB.

Melissa Cruz.

Color of skin: White

Color of hair: Black Approximate height: 5' 05"-5' 07" Approx. age: 28-38 Years

Other id. features: None

Juan de los Santos ONTARIO COUNTY CLERK'S OFFICE York Process Server No. 2067123 FILED

Sworn to before me, on this 14th day of December, 2022

JAN 1 1 2023

MATTHEW J. HOOSE, County Clerk

ACTING DEPUTY CLERK

Juan de los Santos

New York Process Server # 2067123 54 Bristol Street, Ste. 7F Brooklyn, NY 11212

MELISSA CRUZ NOTARY PUBLIC-STATE OF NEW YORK No 01CR6115265 Qualified in Kings County

Notary Public, State of New York

My Commission Expires 09-07-2024

6 of 10pss

Case #6:23-cv-06025-FPG-MWP

IN THE SUPREME COURT OF THE 7TH JUDICIAL DISTRICT OF NEW YORK FOR ONTARIO COUNTY

Leticia Lee

Plaintiff ____

VS

Warner Media LLC (HBO Home Entertainment, Inc., et al

Defendant

AFFIDAVIT OF SERVICE

File/Index No.: 134539-2022

Issued On:

Alt File/Index No.:

Calendar No.:

SERVICE UPON: Grammnet NH Productions via their Registered Agent of Record; 2958127 Jeff W. Lane

STATE OF California, COUNTY OF Los Angeles: ss

AFFIDAVIT OF SUBSTITUTED SERVICE

That I, Bonita Haller hereby solemnly affirm under penalties of perjury and upon personal knowledge that the contents of the foregoing documents are true and do affirm I am a competent person over 18 years of age and not a party to this action

That on 12/14/2022 at 3:01 PM at 11400 W. Olympic Blvd., Suite 200, Los Angeles, CA 90064 I served Grammet NH Productions via their Registered Agent of Record; 2958127 Jeff W. Lane with the following list of documents: Summons and Complaint by then and there personally delivering a true and correct copy of the documents into the hands of and leaving with Maria F. whose relationship is Person in charge.

That the description of the person actually served is as follows: Gender: Female Skin: Hispanic Age: 25-30 Height: 5'3" Weight: 150 Hair: Brown Eyes: Brown Marks:

ONTARIO COUNTY CLERK'S OFFICE FILED

JAN 1 1 2023

MATTHEW J. HOOSE, County Clerk

ACTING DEPUTY CLERK

Subscribed and sworn before me on

Notary Public:

Notary #:

Qualified in County:

My Commission expires on See Attached Certificate

Bonita Haller 2018029861 Amstar Express, Inc 509 Marin Street, # 237,

Thousand Oaks, CA 91360

(888) 778-2711



Case #6:23-c	v-0602	5-FPG	-MWP
M	7	of	1000

CAL	IFO	DN	IA	11	D.	۸ ۳
UML	JEU	1.4	IA.	Ju	100	-

GOVERNMENT CODE § 8202

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

PERIODERANDE PERIO

State of California

County of LOS Angeles



to (or affirmed)	before me on
/ 2 Month	, 20 <u>2</u> , b Year
a Pan Ime(s) of Signer	
	12 Month

proved to me on the basis of satisfactory evidence to

be the person(s) who appeared before me.

Place Notary Seal and/or Stamp Above

OPTIONA	AL
Completing this information can deter fraudulent reattachment of this form	
Description of Attached Document Title or Type of Document: Affallout of	Servine
Title or Type of Document: Affaydit of Document Date: 12/15/22	001410
Document Date: 12/15/12	Number of Pages:/
Signer(s) Other Than Named Above:	
4011	

Case #6:23-cv-06025-FPG-MW	
M 8 of 100	ſ

SUPREME COURT OF THE STATE OF NO	EW YORK	
	X	
LETICIA LEE	:	
Plaintiff,	:	Index No. 134539-2022
	:	Hon. Craig J. Doran
-against-	÷	ACKNOWLEDGEMENT OF RECEIPT OF SUMMONS AND COMPLAINT ON BEHALF OF DEFENDANT GRAMMNET NH PRODUCTIONS
WARNER MEDIA LLC; HBO HOME ENTERTAINMENT, INC.; WARNER BRO WORLDWIDE TELEVISION DISTRIBUTI INC.; NBCUNIVERSAL TELEVISION STUDIO DIGITAL DEVELOPMENT LLC; BROADCASTING INC.; GRAMMNET NH PRODUCTIONS	ON, CBS	
Defendants.		
1. I received a summons and com	nplaint (a co	py of which is attached as Exhibit A) in
the above-captioned matter at the offices of	Davis Wrig	ght Tremaine LLP, 1251 Avenue of the
Americas, 21st Floor, New York, NY 10020-	-1104.	
2. PLEASE CHECK ONE OF THE		WING:
IF 2 IS CHECKED, COMPLETE AS	INDICATE	D:
1. /X/ I am not in military service.		
2. // I am in military service, and my	rank and b	ranch of services are as follows:
Rank: N/A		
Branch of Service: N/A		

TO BE COMPLETED REGARDLESS OF MILITARY STATUS:

Date: January 6	5.2	023
-----------------	-----	-----

I affirm the above as true under penalty of perjury.

Signature Signature

Elizabeth A. McNamara Print Name

Counsel for Defendants Warner Media LLC; HBO Home Entertainment, Inc..; Warner Bros. Worldwide Television Distribution, Inc.; NBCUniversal Television Studio Digital Development LLC; CBS Broadcasting Inc.; and Grammet NH Productions

YV4

92

中 m

ت

37.1E

0001

2720

Case #6:23-cv-06025-FPG-MWP

3

Living Single - Wikipedia

WikipediA The Free Encyclopedia

Living Single



Case #6:23-cv-06025-FPG-MWP



Living Single is an American television sitcom created by Yvette Lee Bowser that aired for five seasons on the Fox network from August 22, 1993, to January 1, 1998. The show centers on the lives of six New York City friends who share personal and professional experiences while living in a Brooklyn brownstone.

Episodes

Season Episodes	Originally aired		Dente	
	First aired	Last aired	Rank	
1	27	August 22, 1993	May 15, 1994	#56
2	27	September 1, 1994	May 18, 1995	#84
3	27	August 31, 1995	May 9, 1996	#111
4	24	August 29, 1996	May 8, 1997	#104
5	13	September 11, 1997	January 1, 1998	#117 ^[1]

Living Single centered on six people consisting of four women and two men living the single life in Prospect Heights, Brooklyn.[2]

The series focused on two different households in one brownstone, one shared by a trig of independent women and another shared by two male friends who had known each other since childhood while living in Cleveland, Ohio. In the first apartment, Khadijah James (Queen Latifah), a hard-working editor and publisher of the fictional urban independent magazine Flavor, lived with her sweet but naive cousin Synclaire James (Kim Coles), an aspiring actress who worked as Khadijah's receptionist and had an affinity for Troll dolls, and her childhood friend from East Orange, New Jersey, Regina "Régine" Hunter (Kim Fields), an image-conscious boutique buyer who was on a constant search for a well-to-do man to spend her life (and his money) with. Later in the series, Régine became a costume assistant for the soap opera Palo Alto. When the soap was canceled, she became a wedding planner and left the apartment to move in with her fiancé Dexter Knight (Don Franklin). Maxine "Max" Shaw (Erika Alexander), a sharp-tongued Attorney and Khadijah's best from their college days at Howard University,





First season DVD cover	
Genre	Sitcom
Created by	Yvette Lee Bowser
Starring	Kim Coles Queen Latifah Erika Alexander Kim Fields John Henton T.C. Carson Mel Jackson
Opening theme	"We Are Living Single", written and performed by Queen Latifah
Country of origin	United States
Original language	English
No. of seasons	5
No. of episodes	118 (<u>list of episodes</u>)

3/28/23, 11:39 AM

Living Single - Wikipedia

Case #6:23-cv-06025-FPG-MWP

frequently stopped by to share her unique insights and the events of her day, to make sure that the girls' refrigerator wasn't overstocked, and to start trouble with Kyle, looking for any chance to make his life worse.

Kyle Barker (T.C. Carson) lived in the second apartment with Overton Wakefield Jones (John Henton). Overton was the friendly but bucolic maintenance man for the owner of their (and neighboring) building, who held a deep affection for Synclaire and plenty of hilarious homespun wisdom for everyone else. Kyle was a stockbroker whose constant verbal sparring with Max did little to mask their obvious sexual attraction to each other. Kyle and Max pursued a sexual relationship, but when he decided to take a job in London and invited Max to join him, she turned him down. Maxine subsequently became distraught over her decision and, after defending a man who claimed to be the second coming of Jesus (Harold Perrineau), she began to take her life more seriously. Through a series of events, Max decided that her purpose must be to become a mother. During the insemination process, she unknowingly picked Kyle's sperm specimen based on a list of qualities she would like for her child to have. Kyle returned in the series finale, and the two reconciled. Overton and Synclaire also got together, and their relationship culminated in marriage by the end of the fourth season. In season five, they moved in together, leaving Overton and

	ase #6:23-cv-06025-FPG-MWP
	Production
Executive producers	Yvette Lee Bowser Roger S.H. Schulman
Production locations	Warner Bros. Studios, Burbank, California
Camera setup	Videotape; Multi-camera
Running time	22 minutes
Production companies	SisterLee Productions (1994–1998) (seasons 2–5) Warner Bros. Television
	Release
Original network	Fox
Picture format	NTSC
Original release	August 22, 1993 – January 1, 1998

Kyle's apartment open for new character Roni DeSantos (<u>Idalis DeLeon</u>), a New York-area D.J., to move in. It was eventually revealed that DeSantos had a fling with Ira Lee "Tripp" Williams III, (<u>Mel Jackson</u>), a songwriter whom Khadijah and Régine allowed to move in when Synclaire's room became available. Synclaire joined a comedy improv troupe where she gained the attention of Tony Jonas, a Warner Bros. Television executive who cast her as a nun for a new comedy series he was developing.

Along with trying to make *Flavor* a success, Khadijah also looked for Mr. Right. She eventually found him in childhood friend Scooter (<u>Cress Williams</u>), with whom she left the brownstone for the final time in the series finale.

Cast and characters

Regular cast

- Queen Latifah Khadijah James, <u>Howard</u> graduate and <u>editor</u> and <u>publisher</u> of *Flavor* Magazine, an independent magazine devoted to the interests of the African-American community.
- <u>Kim Fields</u> Regina "Regine" Hunter (Episodes 1–115), Khadijah and Synclaire's gossip-loving roommate; Khadijah's childhood friend.
- <u>Kim Coles</u> Synclaire James-Jones, Khadijah's good-natured cousin and roommate; receptionist at *Flavor* and aspiring actress. The role of Synclaire was originally intended for Queen Latifah's long-time friend and collaborator, Monie Love, but she was unable to take the part.
- Erika Alexander Maxine "Max" Felice Shaw, strong-willed <u>Attorney</u>, Khadijah's best friend and former college roommate at Howard, who grew up in Mount Airy, Philadelphia; spends most of her

Case 6:23-cv-06025-FPG-MWP Document 15-1 Filed 04/04/23 Page 96 of 96

time at the women's apartment.

- <u>T.C. Carson</u> Kyle Barker (Episodes 1–107; guest appearance in episode 118), <u>stockbroker</u> and Overton's roommate; Max's verbal sparring partner and on-again-off-again love interest.
- John Henton Overton "Obie" Wakefield Jones, Kyle's roommate and the brownstone's handyman; Synclaire's sweetheart, also co-owner of the apartment complex the gang lived in.
- Mel Jackson Ira Lee "Tripp" Williams (Season 5), Khadijah and Regine's new roommate; aspiring songwriter.

Case #6:23-cv-06025-FPG-MWP

Recurring cast

- Chip Fields Laverne Hunter, Regine's mother
- Rita Owens Rita James (Season 1–4), Khadijah's mother
- Michael Warren Ed James (Season 4), Khadijah's father
- Barbara Montgomery Nana James (Season 2), Khadijah's grandmother
- Khalil Kain Keith (Season 3–4), Regine's boyfriend and artist
- Don Franklin Dexter Knight (Season 5), Regine's boyfriend turned fiancé
- Cress Williams Terrence "Scooter" Williams, Khadijah's childhood friend and boyfriend
- Isaiah Washington Dr. Charles Roberts (Season 4), Khadijah's anesthesiologist and boyfriend
- Heavy D Darryl, Regine's boyfriend (3 episodes)
- Shaun Baker Russell Montego, Jamaican-born music editor at Flavor, in love with Regine.
- Bumper Robinson Ivan Ennis (Season 3–4), Flavor copy aide and journalism major at New York University, in love with Khadijah.
- Idalis DeLeon Roni DeSantos (Season 5), popular New York City deejay and Tripp's love interest

Guest cast

- Cylk Cozart Brad Hamilton, Regine's boyfriend who turned out to be married (Season 1, Episode 1)
- Freda Payne Miss Harper (Season 1, Episode 2)
- Thomas Mikal Ford Michael Edwards, Synclaire's date (Season 1, Episode 3)
- Jeffrey D. Sams Greg, Maxine's ex-boyfriend (Season 1, Episode 4)
- Kellita Smith Susan, Greg's fiancée (Season 1, Episode 4)
- Miguel A. Nunez Goldie (Season 1, Episode 6 & 20)
- Montrose Hagins Shirley Shortridge (Season 1, Episode 7)
- Marcus Giamatti Jack Peabody (Season 1, Episode 7)
- Dominic Hoffman Patrick (Season 1, Episode 8)
- <u>Isabel Sanford</u> Mrs. Ryan (Season 1, Episode 10)
- Ed McMahon as himself (Season 1, Episode 12)
- Flip Wilson as himself (Season 1, Episode 12)
- <u>Dres (rapper)</u> as himself (Season 1, Episode 12)
- Nia Long Stacey Evans, photographer for Flavor and Kyle's date (Season 1, Episode 13)
- Terrence Howard Brendan King, Maxine's college-aged boyfriend (Season 1, Episode 17)
- Cree Summer Summer, Overton's date (Season 1, Episode 18)
- Kelvin Mercer Morris King, (Season 1, Episode 18)
- Morris Chestnut Hamilton Brown, the new upstairs neighbor (Season 1, Episode 18)
- Michael Jai White Steve (Season 1, Episode 20)